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# **Warrington Borough Council**

## **Local Plan**

### ***Preferred Development Option***

### **Regulation 18 Consultation**

### **Standard Response Form**

**July 2017**

## 1: Contact Details (Compulsory)

Title: Mr

First Name: [REDACTED]

Last Name: [REDACTED]

Organisation (if applicable): Pegasus Group on behalf of Taylor Wimpey UK Ltd.

Address:

Suite 4b  
113 Portland Street  
Manchester  
M1 6DW

Phone Number:

E-mail: [REDACTED]@pegasuspg.co.uk

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

Resident in Warrington  Resident from outside of Warrington

Business

Other, please specify



# **WARRINGTON BOROUGH COUNCIL LOCAL PLAN PREFERRED DEVELOPMENT OPTION REGULATION 18 CONSULTATION**

## **REPRESENTATION BY TAYLOR WIMPEY (UK) LTD**

Date: 26<sup>th</sup> September 2017

Pegasus Reference: GL/P16-0574/R004v5

### **Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

**T** 0161 393 3399 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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## **1. INTRODUCTION**

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representations to the Warrington Local Plan 'Preferred Development Option Regulation 18 Consultation', which ran between 18<sup>th</sup> July and 29<sup>th</sup> September 2017.

### ***Taylor Wimpey's Land Interests***

1.2 Taylor Wimpey are active within the Warrington Local Authority Area and have made separate site specific representations on the following sites:

- Land west of Stocks Lane, Penketh (Call for Sites Reference: R18/138); and
- Reddish Hall Farm (Call for Sites Reference: R18/142, and various other parcels which form part of the proposed Warrington Garden City Suburb).

1.3 Accordingly, this document provides more general comments on the Preferred Development Option and supporting evidence base.

### ***Representation Structure***

1.4 The structure of these representations takes the following form:

- In **Section 2** we comment on the key issues raised in the Scope and Contents consultation and Call for Sites process and how the Council have responded to them (Chapters 2 & 3);
- In **Sections 3 – 6** we look at the Council's approach to deriving a Preferred Development Option (Chapter 4), which is divided into 4 stages:
  - Stage 1 - Development Needs and Associated Land Requirements (**Section 3**);
  - Stage 2 – Strategic Objectives for the Local Plan (**Section 4**);
  - Stage 3 – Assess high level spatial options to accommodate development (**Section 5**);
  - Stage 4 – Assess options for main development locations (**Section 6**);
- In **Section 7** we comment on the Preferred Development Option (Chapter 5); and
- In **Section 8** we summarise and conclude our representations.

## **2. KEY ISSUES FROM PREVIOUS CONSULTATION/ CALL FOR SITES (CHAPTERS 2 & 3)**

- 2.1 This section comments on Chapters 2 and 3 of the Plan which sets out the key issues raised in the Scope and Contents consultation and Call for Sites process and how the evidence base has been updated to address these.
- 2.2 At the outset, it is noted that whilst this Preferred Development Option consultation confirms a 20-year plan period, it does not clearly set out the actual dates of the period. The evidence and housing targets within the document suggests that the Plan will run from 2017 to 2037, which has changed from the Scope and Contents stage, where Officers confirmed this period would run from 2016 to 2036. Therefore, to avoid any confusion we would request that the Council clarify this matter in any future version of the Plan, by clearly setting out the plan period in the introduction.

### **Evidence Base Issues**

- 2.3 A critique of the Council's Call for Sites Assessment, Green Belt Assessment (June/ July 2017) and Sustainability Appraisal is provided within our site-specific representations; whilst the Housing Need and Land Supply evidence is addressed in section 4.

### **Proposed Scope of Local Plan Review**

- 2.4 We agree with the Council's decision to pursue a new Local Plan rather than a review, given that housing need is more than double the previously adopted requirement, and therefore a step change will be required in terms of delivery, and a new plan will help provide the clarity to achieve this.

### **Duty to Cooperate**

- 2.5 We welcome the Council's active and ongoing engagement with neighbouring authorities under the 'Duty to Cooperate' as set out in paragraphs 2.36 to 2.41 of the document; with St Helens and Halton in particular, given that they are identified as part of the same Mid-Mersey Housing Market Area where issues of cross-boundary housing need and delivery will be vitally important.
- 2.6 We also welcome the acknowledgement that whilst Warrington is not part of the Liverpool City Region it needs to ensure that its evidence base accounts for the work being undertaken by the City Region (para 2.39); and we would suggest that the same approach is taken with the Greater Manchester Region.
- 2.7 The Liverpool City Region 'Strategic Housing and Employment Land Market Assessment' (SHELMA) was due on consultation earlier this year, whilst the Publication Version of the 'Greater Manchester Spatial Framework' (GMSF) was due out this summer; however both have been delayed, with the GMSF till at least next June; so these documents will need to be closely monitored as they will clearly exert an influence on housing and employment requirements in Warrington.

### **Call for Sites**

- 2.8 Whilst we address this in more detail in our site-specific representations we do have some general comments. Firstly, it is our view that using a net site area of 75% and a density of 30 dph to estimate the total capacity of Green Belt sites (see paragraph 3.4) is a little optimistic, given that these sites will often be subject to constraints that reduce their developable area (such as areas of flood risk, landscape issues, or protected woodlands or wildlife areas), and will often lend themselves to lower density suburban development anyway. As such a developable area of 55-60% is considered more realistic, suggesting a capacity closer to 40,000.
- 2.9 The Council do acknowledge this later in the document (paragraph 5.38) in respect of the Garden Suburb where they apply a 20 dph gross density rate which equates to a developable area of 66% at a net density of 30 dph.
- 2.10 Secondly, we would question whether it's realistic for the Fiddlers Ferry power station to be brought forward in the plan period (paragraph 3.6), given that there is no firm indication of when it will close, with the owner's SSE suggesting it could be open till at least 2023 and potentially beyond.<sup>1</sup>
- 2.11 Furthermore, there does not appear to have been investigation of the ground conditions and other constraints at the site, and the implication that these would have on bringing the site forward, both in terms of viability and lead in times. Until such evidence is provided we suggest this reference is removed from the Plan.

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<sup>1</sup> <http://sse.com/whatwedo/ourprojectsandassets/thermal/FiddlersFerry/>

### **3. STAGE 1 - DEVELOPMENT NEEDS & LAND REQUIREMENTS (CHAPTERS 2 & 4)**

3.1 We now address the Council's approach to their housing land requirement and supply, with reference to various evidence base documents described in Chapters 2 and 4 of the plan.

#### **Confirming Development Needs**

3.2 Taylor Wimpey support the proposed housing requirement of **1,113 homes per annum** over the 20 year period, as set out in paragraph 4.7, and commend the Council for exceeding the OAN figure set out in the Mid Mersey SHMA, and seeking to meet the ambitious jobs growth target set out in the Local Enterprise Partnerships' (LEP) Devolution Deal; which are considered achievable, given Warrington and the wider LEP's strategic position between the two major City Regions of Manchester and Liverpool. This suggests a positively prepared plan that aligns job growth and housing need to boost housing supply, in line with the NPPF.

3.3 That said, it is still important that this requirement is viewed as a net minimum figure rather than a cap, to allow some flexibility to respond to increased need through the plan period, which could happen under several scenarios set out by the HBF in their representations and summarised below:

- Jobs growth – Past trends in Warrington actually suggest a higher rate of jobs growth than that set out in the SEP, which would create a need for up to 1,332 dpa.
- Commuting – All the scenarios in the SHMA are based on a static commuting ratio of 0.88, however the projected job growth may increase the desire to live in the area, which would reduce in-commuting and require greater housing provision as a result.
- Household Formation Rates (HFRs) – The SHMA makes no allowance for increased HFRs in the future and simply bases them on past trends. Continuing in this way could lead to a continuation of the conditions which led to the current housing crisis, which is characterised by increasing affordability issues and evidence of younger households being excluded from the housing market. To address this Warrington could consider an uplift to HFRs for the 25-44 year age groups, as those most affected by the current crisis. Once again this would lead to an increase in housing need.
- Economic Activity Rates (EARs) - The 2017 SHMA Addendum uses rates provided by Experian, whilst the HBF favour the lower rates provided by the Office of Budget Responsibility (OBR). Given the aging nature of the population the Experian rates will effectively mean that significantly more people are assumed to work past pensionable age which may not be reasonable or desirable. Once again, a lower EAR would require a higher housing requirement due to the need to provide a greater pool of labour.
- Affordable Housing Need / Affordability - The 2017 SHMA Addendum notes significant affordable need. Whilst it is suggested that this need could be addressed over the full plan period, this means that the existing backlog will not be fully met for up to 20 years; leaving many people in substandard accommodation for a considerable time. In addition,



affordability in Warrington is worsening. Overall, higher levels of housing delivery, particularly early in the plan period will help to address these issues.

- 3.4 We welcome the Council's acknowledgement (at paragraph 2.10) that they will need to take account of Government's proposed new standard methodology for calculated housing need; which went on consultation on Thursday 14<sup>th</sup> September 2017.
- 3.5 At the outset, it must be noted that this only a consultation and can be given very little weight at this stage. In addition, it only covers the 10 year period from 2016-2026, whilst Warrington's plan covers the 20 year period 2017-2037.
- 3.6 In Warrington's case, this methodology generates a reduced housing need for Warrington of **914 dpa**, mainly as a consequence that it only seeks to address affordability/ market signals issues and does not take account of any economic or job growth aspirations, which are obviously a key element of Warrington's chosen requirement.
- 3.7 That said, paragraph 46 of the consultation document does confirm that it will support ambitious Local Authorities who wish to go above this standard calculation, and specifically mentions a LEP Investment Strategy, such as that proposed in Warrington, as a circumstance where this might be justified:
- "Plan makers may put forward proposals that lead to a local housing need above that given by our proposed approach. This could be as a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy. We want to make sure that we give proper support to those ambitious authorities who want to deliver more homes."*
- 3.8 As such, it is our view that Warrington has a strong case to deviate from this methodology to increase its housing figure if needed and maintain its alignment with the LEP aspirations for the area.
- 3.9 Finally, paragraph 4.6 confirms that the level of growth proposed will help Warrington make the transition from New Town into New City which will help to address the severe congestion that impacts on the town. This is the first mention of the 'New City' concept, which features throughout the development options and Sustainability Appraisal. This concept is understood to come from the Strategic Economic Plan and marketing material supporting the devolution bid; however it is not explained or expanded upon here, particularly in terms of how it will address congestion, and this should be clarified in the next stage of the plan, given it is clearly central to the chosen development option.

### **Maximising Urban Capacity**

- 3.10 Taylor Wimpey fully support the principle of maximising development in existing urban areas, as a means of promoting sustainable growth. However we have significant concerns with the Council's calculations in this instance, in particular the levels of delivery anticipated in the first 10 years of the plan period.
- 3.11 The plan suggests a total urban capacity of 15,429 homes at paragraph 4.10, which is explained in the Urban Capacity Assessment Update 2017, where it is broken down as:
- 9,721 homes identified through the 2017 Strategic Housing Land Availability Assessment (SHLAA);
  - 7,588 homes from the masterplanning work;
  - 435 homes from small site allowance; and
  - - 2,285 to avoid double counting between the SHLAA and masterplanning work.
- 3.12 Even with this deduction, this assumes that land for over 5,300 new dwellings (over 20% of the planned total), that has not currently been put forward for residential development will become available during the plan period, based solely on its allocation in the plan, which seems hugely optimistic considering the large number of ownerships and the fact that several sites are already occupied with alternative uses, whilst others will only be unlocked through significant infrastructure investment.
- 3.13 It is also highly pertinent to note that this masterplanned capacity has increased by more than 50% from the 3,460 estimated at the Scope and Contents stage; whilst the SHLAA total has actually decreased by over 10% from 10,806 to 9,721, which casts further doubt on whether these figures are realistic.
- 3.14 What's more, 65% of the total urban capacity (9,985 of 15,429 dwellings) is expected to come forward within the first 10 years of the plan period, which again seems unrealistic, given the ownership, land use and infrastructure constraints set out above, as well as the other difficulties and delays associated with urban regeneration schemes (contamination etc).
- 3.15 Finally, the small site requirement is likely to include some double counting as opportunities for small sites coming forward will be greatly reduced in the last 5 years of the plan period given the comprehensive masterplanning and regeneration of urban areas planned for the first 15 years, which will clearly use up the vast majority of the urban land supply, and therefore such windfall is highly unlikely to continue at past rates.
- 3.16 Therefore, for the reasons set out above, we raise serious questions over the timescales and deliverability of 15,429 dwellings in the urban area during the plan period, and we assess the Council's Masterplanning Exercise in more detail in section 7.

### Land requirements for homes and employment

- 3.17 Taylor Wimpey welcome the Council’s inclusion of a backlog figure from their OAN since 2015, as even though this predates the plan period, it reflects the fact that they have not had a target in place since the Core Strategy was quashed in 2015 and that unmet need will have accrued in that period.
- 3.18 We also welcome the inclusion of a buffer in the total housing land requirement to provide flexibility as required by the NPPF. There are two main reasons for the inclusion of such a buffer. Firstly, the housing requirement is a minimum figure which Local Plans should seek to surpass, and this interpretation has been endorsed in numerous Local Plan examinations. Secondly, it is inevitable that some sites will either under-perform or fail to deliver during the plan period due to technical difficulties, planning delays or market pressure. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Indeed, paragraph 47 of the NPPF confirms a buffer is necessary to *‘provide a more realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land’*.
- 3.19 This is particularly relevant in Warrington given there is significant emphasis placed upon 3 large growth areas: Waterfront, Garden City Suburb and South West Urban Extension; whilst many of the sites identified within the Council’s Urban Capacity/ Masterplanning exercise have not actually be put forward for development by their owners, and some are in alternative use. In short, this does not provide a great deal of choice.
- 3.20 Therefore it is our view that a 5% buffer is insufficient in this instance and should be increased. The Council justify it on the basis of their past delivery record, their commitment to development through the Warrington and Co Masterplanning exercise and the potential for Fiddlers Power Station to come forward. However the emerging plan will require step change in delivery, and so past delivery can’t be relied upon, and nor can the masterplanning or the power station for the reasons set out above. Indeed, the Council already acknowledge a sizeable backlog in terms of their housing delivery since 2015 and this will continue until sites are released from the Green Belt, particularly given the adopted Local Plan has no housing chapter.
- 3.21 The past delivery rate is as follows compared to the Council’s annual requirement of **1,113**:

*Figure 3.1 – Past Delivery in Warrington*

2011/2012	2012/2013	2013/2014	2014/2015	2015/2016
600 dwellings	647	693	687	595

- 3.22 In short, Warrington will have a record of persistent under delivery and will need to apply the NPPF 20% buffer.

- 3.23 Furthermore, the LPEG report to Government (dated March 2016) recommended a 20% buffer<sup>2</sup>, and that is what has been added to employment land provision, so we would suggest a similar approach is taken with the housing requirement.
- 3.24 Adding the recommended 20% buffer to Warrington's net requirement of 22,260 (then adding the backlog) would require sites capable of delivering a total of 27,559 dwellings (or 3,339 more than currently planned). This would require Green Belt release for at least 12,130 homes and this figure would obviously rise if the urban capacity were to reduce as we expect it to.
- 3.25 Finally we would reiterate our point from section 2 that the density assumptions of 75% developable area and 30 dph are hugely optimistic for the Green Belt sites, which is further justification for an increased buffer. In respect of employment land, it is noted that the Council base their projected land need on past take-up yet do not consider this a robust basis for forecasting job growth in the future. Whilst this is justified on the basis that growth sectors such as distribution generate very low employment densities, this is not clearly evidenced; and could generate imbalances in the future, if employment densities continue at current levels. Indeed, it is not as though Warrington has not received its fair share of distribution centres in recent years. Of all authorities in the North West, trends based on past land take up data in Warrington, should be relatively robust and reflect the current employment market.

### ***Safeguarding Requirements***

- 3.26 Taylor Wimpey support the Council in identifying safeguarded land; however the guidance clearly states that such land should meet longer term development needs stretching '*well beyond the plan period*' and that green belt boundaries that are '*capable of enduring beyond the plan period*'. In light of this and the fact that the existing plan period runs for 20 years, it is suggested that the safeguarded land requirement covers a further 20 years, rather than the 10 proposed, to ensure a robust long term Green Belt boundary and more certainty for developers and residents.
- 3.27 In terms of how this this housing figure translates into a 137.52 hectare land requirement in Table 3, we would reiterate our comments from previous sections that 75% developable area and 30 dph is highly optimistic, and therefore additional land is likely to be required meet the safeguarded requirement regardless of whether the period increases.
- 3.28 Table 3 proposes a 9-year requirement for housing land, to take account of the 5% buffer applied within the main plan period; and 5 years for employment to take account of the 20% buffer.
- 3.29 Firstly, it must be noted that the 20% buffer for employment land equates to 4 years not 5, which is an error. Secondly, and more importantly, if these buffers are required during the main plan period as expected then they won't be available for future development, and therefore they should not be used to discount the safeguarded land requirement. Indeed, the 5% NPPF buffer is there 'to

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<sup>2</sup> Recommendation 40 (at Appendix A)

*ensure choice and competition in the market for land* and is a continuous requirement imposed by the NPPF.

- 3.30 We also take issue with the urban/ green belt split that is proposed in paragraph 4.24 (64% to 36%) as this is based on the split in the existing plan period. However, the current plan involves major urban regeneration which will see the majority of brownfield supply exhausted, so it is unclear where this additional land will come from, suggesting that the green belt ratio needs to be significantly increased.
- 3.31 The Council suggest that there is a likelihood of future brownfield land in Warrington but don't explain this in any level of detail other than mention of Fiddlers Ferry site again. In this section, the Council state this site will come forward beyond the current plan periods which contradicts earlier statements suggesting it could come forward in the current plan period. We suggest further evidence is provided on this, particularly on anticipated delivery timeframes of Fiddlers Ferry.
- 3.32 It is also evident that providing 36% of new housing in the Green Belt but 71% of new employment will lead to an imbalance, as the new houses won't be near the new jobs, which could exacerbate congestion issues and unsustainable travel patterns.
- 3.33 Based on the above we suggest safeguarded land for at least 22,260 dwellings is identified in the plan. Using a developable area of 60% and assuming a Green Belt ratio of 50% this would require up to 618 Ha of safeguarded housing land to be identified based on a 20-year requirement or 309 Ha based on a 10-year requirement.
- 3.34 Finally, we would suggest that the Council provide triggers in the plan which would allow for safeguarded land to be released, through a plan review, and this could be tied to the housing delivery test thresholds suggested in the recent White Paper. These triggers could also consider delivery in adjacent authorities in the Mid Mersey HMA, as well as those in the wider City Regions of Manchester and Liverpool.

#### **4. STAGE 2 – STRATEGIC OBJECTIVES (CHAPTER 4)**

- 4.1 At the outset we would reiterate our view that whilst the New City Concept is clearly central to the Council’s strategic objectives it is poorly explained throughout this document, including the bullet points in paragraph 4.37 and would ask that more clarity is provided on this.
- 4.2 That said, we fully support the acceptance that Green Belt release is required, and welcome the fact that the exceptional circumstances for this are set out in paragraphs 4.40 – 4.43, including the acknowledgement in paragraph 4.41 that not releasing green belt to meet housing needs will have major socio-economic impacts, on infrastructure, local services and the general health and well-being of the population. We would agree that this satisfies the requirements of paragraph 83 of the NPPF and has been accepted in neighbouring authorities including Cheshire West and Chester, Cheshire East and Knowsley in recent years.
- 4.3 Moving on to the objectives themselves we make the following comments:
- W1 and W2 – In terms of the housing requirement and green belt release, we would reiterate our comments from the previous section, and question whether the plan as drafted will meet the White Paper’s objective of accelerating delivery in the earlier parts of the plan period (and we revisit this in our delivery analysis in section 7).
  - W3 – We would question whether the level of residential regeneration anticipated in the Town Centre would also allow the Town Centre to truly expand as a regional employment, retail and leisure hub.
  - W4 – Given that none of the proposed development options consider growth around train stations or other transport hubs, and that a large amount of development (over 9,000 units) is proposed to the south of the Ship Canal, where there are only 3 crossings; it is unclear how the plan will reduce congestion and promote sustainable transport options (and we address this in more details in sections 5-7).
- 4.4 We also consider that the objectives should include some reference to supporting and maintaining the sustainability of the outlying settlements to ensure compliance with paragraph 55 of the NPPF.

**5. STAGE 3 – HIGH LEVEL SPATIAL OPTIONS (CHAPTER 4)**

- 5.1 We have no objections to the 3 high level options that have been chosen, but would suggest that other reasonable alternatives could be considered, albeit it is difficult to say whether some of these would constitute high level options or could be accommodated in Stage 4.
- 5.2 One option that should have been considered at this stage, would be one that focussed development around transport hubs (i.e. train stations), given that the rail network is acknowledged as a key asset in the borough, and traffic congestion is a major constraint as noted in the main consultation document and AECOM Transport Summary. This would also directly address Strategic Objective 4 as discussed in the previous section.
- 5.3 Given the spread of stations, with 2 in the City Centre, 3 on the urban fringe and 1 in an outlying settlement, this would be quite distinct from the other 3 options in terms of spatial distribution.
- 5.4 Notwithstanding this we support the general principles of Option 2, in that larger scale Green Belt release adjacent to the urban areas is generally more sustainable and will support the objectives of the plan; whilst smaller scale growth in the outlying settlements will support services and maintain vitality in these locations in line with paragraph 55 of the NPPF. However, we do note that the Council have not considered all settlements within the Borough and are required to look at the needs of smaller villages too, including an assessment of whether such villages should be inset within the Green Belt or washed over. The Council's evidence base does not do this currently and it is suggested the exercise is undertaken before the Local Plan is submitted so as to avoid considerable delay in the process.
- 5.5 Finally, we note that neither Option 2 or indeed any of the 3 options specifically mention a garden suburb or major settlement extension, yet 4 of the 5 options in Stage 4 include this, so we would ask that more justification is provided for how these options have been refined and progressed.

## **6. STAGE 4 – MAIN DEVELOPMENT LOCATIONS (CHAPTER 4)**

- 6.1 As noted above we consider that Stage 3 should have considered an option focussing development around train stations; however the chosen Option 2 would not directly conflict with this aspiration so could still be considered in Stage 4.

### **Define Options for Main Development Locations**

- 6.2 In terms of how the 5 options are defined, we agree with the principle that the outlying settlements would be capable of accommodating at least 1,000 units; and it is perfectly feasible that they could accommodate more development without compromising the aspirations of the New City. Indeed, thriving outlying settlements will surely support the Town Centre by providing diverse housing choice for new and future residents and ensure all settlements are able to grow and support existing services in a sustainable manner.
- 6.3 The Area Profiles and Sustainability Appraisal evidence has then been then used to narrow down the options to 6 components, including a Garden City Suburb of 3 varying sizes, an urban extension to South West Warrington, a further extension to the west of Warrington. These are then combined to form 5 development options set out in Table 8.
- 6.4 Whilst the evidence does broadly support identification of these three locations, and is by its very nature a high level exercise, the allocation numbers seem fairly arbitrary, and it is possible that other variations of numbers and components could have been considered, such as a combination of dispersed growth and urban extensions; particularly given that it is our strong view that significant additional land will need to be identified and released to allow for under-delivery, as set out in section 3 (Stage 1).

### **Initial Confirmation of Preferred Main Development Locations**

- 6.5 It is clear from the commentary in Table 8 and the supporting Area Profiles and Sustainability Appraisal that infrastructure delivery is considered fundamental to the plan, and that larger urban extensions are seen as the key to achieving this due to economies of scale and land availability.
- 6.6 Whilst we support this principle, it must be offset against the need to ensure delivery throughout the plan period, particularly in the first 5 years, in line with the NPPF guidance, and this will only be achieved by providing a wider range of site sizes.
- 6.7 Combining these two aspirations (early delivery and infrastructure provision) would discount Options 1 and 5 outright, and would point to including all 3 urban extensions as per Option 4; potentially with some additional dispersed growth and a larger Garden Suburb as per options 2 and 3 (given that significant additional land will be required); however, Option 2 has been chosen.
- 6.8 The Reddish Hall Farm land (Call for Sites Refs: R18/142) falls within the Garden Suburb. We support this allocation, given the relatively low Green Belt impacts in this location, the need for



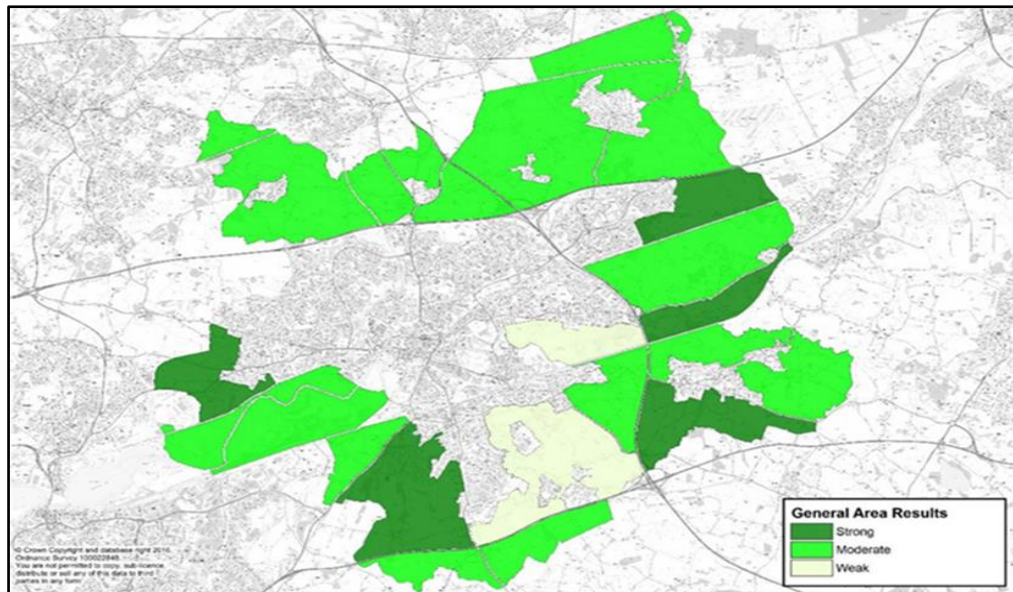
new homes in Warrington and the significant opportunities for infrastructure improvements. Even if Option 4 was followed as we propose, then the Garden Suburb could still accommodate a significant number of units as per Options 2 and 3, given the increased amount of land that will need to be identified.

- 6.9 The Stocks Lane site (Ref: 18/138) falls within the 'Western Warrington extension' and given that we have demonstrated that the site can begin delivering in the first 5 years and does not make a significant contribution to the Green Belt, it should be included, either as part of a formal urban extension or as a standalone site.
- 6.10 The site is also within walking distance of Sankey with Penketh Train Station and would therefore directly support sustainable travel patterns in line with Strategic Objective W4.
- 6.11 Furthermore, our site-specific representations have confirmed that the site scores above average in the Sustainability Appraisal (73 compared to an average of 70.52 using a comparable scoring system), and higher than several of the sites which have been allocated (which average 68.66-72.06), whilst our analysis suggests this score could also be increased to 80, making it the 4<sup>th</sup> highest scoring site out of 123.
- 6.12 This analysis also confirms that all the sites in the Western Area generate an average score of 76 in Sustainability Appraisal, which is higher than all the other strategic areas (North, East, South and Central). That said, it must be acknowledged that this is a measure of the average sustainability of individual sites in an area rather than a measure of the overall sustainability of a wider strategic area or urban extension.
- 6.13 Either way, the assessment in the main consultation document discounts the West Warrington Extension for three main reasons. Firstly, due to the strong contribution the area makes to the Green Belt; secondly due to the pressure it will exert on existing schools, and thirdly due to the fragmented nature of the available sites, and the fact that these will hinder infrastructure delivery. We deal with these points in turn.

### ***Green Belt Issues***

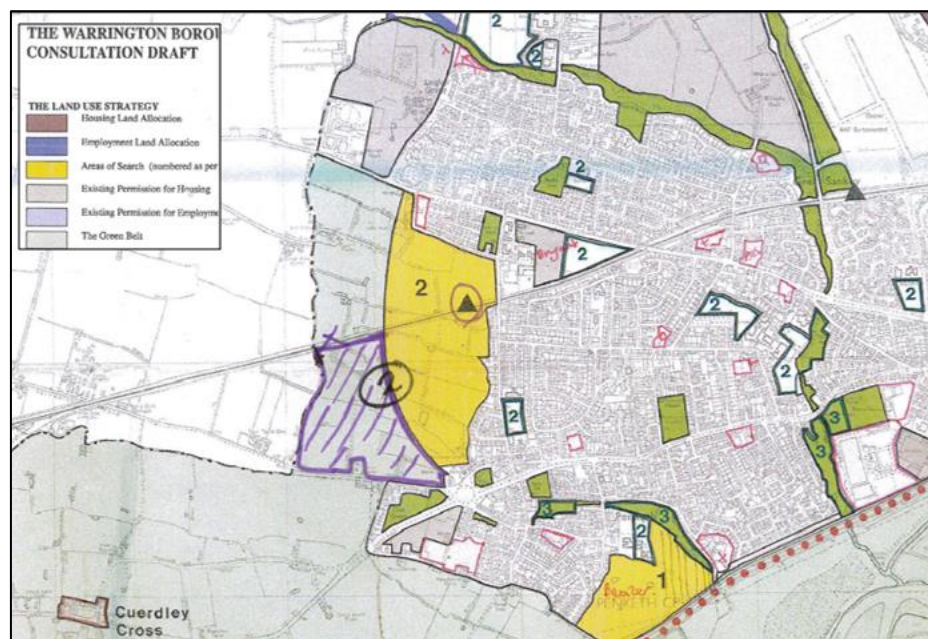
- 6.14 In terms of Green Belt issues, this goes back to Stage 1 of the Arup Green Belt Assessment in October 2016 where the wider area between Penketh and Widnes (General Area 17) was considered to make a strong contribution. However, this was based on a large area, which if developed in full, would clearly lead to coalescence, rather than the site being promoted by Taylor Wimpey, which is not as expansive.
- 6.15 Our individual assessment (within our site-specific representations, Development Statement and our earlier representations to the Scope and Contents document) has clearly demonstrated that the Stocks Lane site makes no more than a moderate contribution; and whilst the Council state that the site has scored strongly in both the parcel and individual assessment; the Council's individual site assessment judgement is incorrect.

Figure 6.1 - Arup General Area Assessment, October 2016



6.16 Indeed, it must be highlighted that the Council have previously identified the land west of Penketh within a larger area of search for potential safeguarding/ release from the Green Belt, in the Warrington Borough Draft Plan from 1993; suggesting that this area has been considered to make a less than strong contribution to the Green Belt in the past.

Figure 6.2 - 1993 Draft Local Plan extract showing safeguarded area



### **School Capacity**

6.17 In respect of secondary schools, we acknowledge that the 3 existing schools in the West Warrington Area are at or near capacity with limited expansion potential; however, the new secondary school

proposed as part of the Garden Suburb, in the South Warrington area, will free up some capacity, by providing an additional secondary school in South Warrington (where there is only one currently, Bridgewater High School). In short, fewer pupils will have to travel to school in West Warrington and other areas. As such, the lack of school capacity is not considered to be a robust justification to dismiss the site.

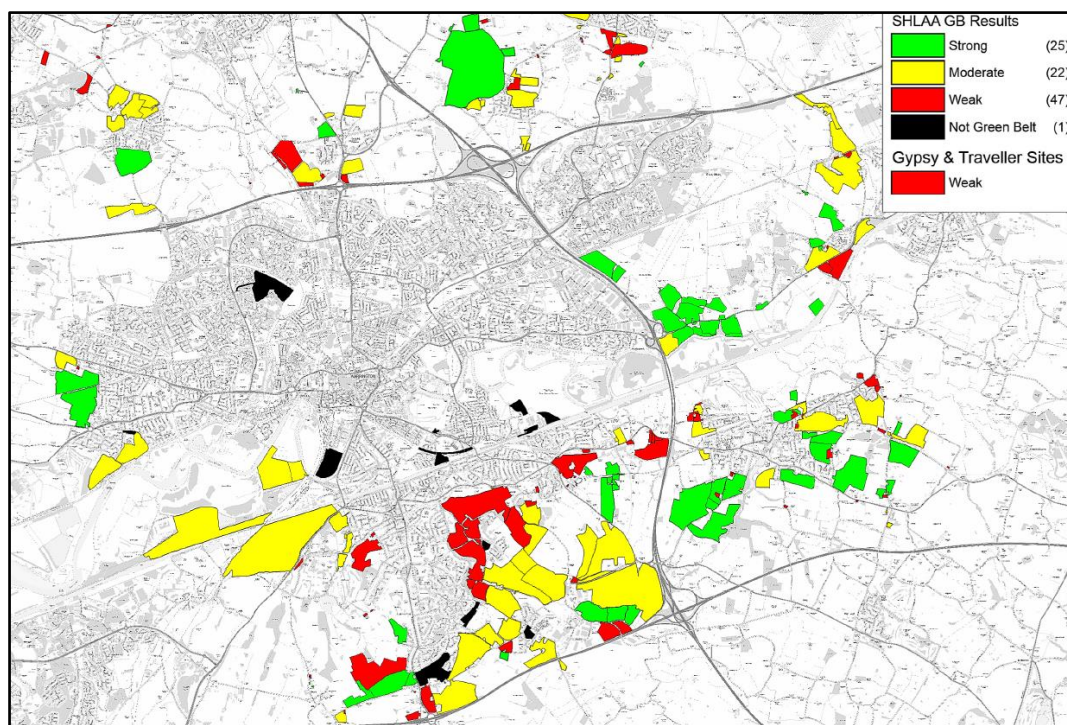
6.18 Moreover, the Area Profile for West Warrington does confirm that 7 of the 13 primary schools have 'moderate capacity' and that 2 of 13 have good expansion potential, including Penketh Community School which is closest to the site; with the 'forecast capacity' section concluding that schools in the south of this area (as the Stocks Lane site is) will have some capacity.

***Fragmented Sites***

6.19 In terms of the sites in the Western extension being fragmented, individual standalone sites actually have better prospects for delivering in the early part of the plan period, and providing balance with the larger extensions which will take much longer to get up and running.

6.20 Furthermore, there is nothing to stop the Council from joining up fragmented sites physically by adding in additional land so as to stimulate growth and buy-in from landowners who haven't yet engaged. Indeed, this is central to the Council's City Centre Masterplanning Exercise, and is also evident in the Garden Suburb, where several areas of land have been included that have not been submitted to the SHLAA or call for sites. The fragmented western sites could be joined up in policy terms by grouping them together under one policy which sets out necessary infrastructure requirements that would need to be delivered.

*Figure 6.3 - Map showing sites submitted to SHLAA/ Call for Sites process*



### **Conclusion on Development Options**

- 6.21 To conclude, whilst we support the components in Stage 4, we suggest that a hybrid of Options 4 and 5 is pursued, including increased delivery around transport hubs and to the outlying settlements if required.

**7. PREFERRED DEVELOPMENT OPTION (CHAPTER 5)**

- 7.1 As noted in the previous section we disagree with the preferred development option on the basis that it is over-reliant on a small number of large strategic sites, which will ultimately limit choice in the market, and the opportunities for some small/medium sized housing developers to be engaged, and means additional levels of risk have to be applied when considering what will genuinely be delivered within the plan period.
- 7.2 We also consider that capacity within the existing urban area has been significantly overestimated and that this combination will lead to the plan under delivering, particularly in the first 10 years of the period.
- 7.3 To demonstrate this, we provide our own deliverability assessment and trajectory for each of the strategic areas, along with more general comments on the sustainability and potential impacts of the proposed option.

**City Centre & Warrington Waterfront**

- 7.4 Tables 13 and 17 set out the proposed development trajectory for the City Centre and Waterfront Areas which reflect the detailed trajectory datasheet and Character Area plans which set out the various parcels (A1-K32) within the Masterplanning evidence.

	0-5	6-10	11-15	16-20	Total
City Centre	980	1,629	569	348	3,526

Table 13: City Centre Housing Trajectory

	0-5	6-10	11-15	16-20	Total
Waterfront	728	795	1,790	719	4,032

Table 17: Waterfront Housing Trajectory

- 7.5 However at the outset it should be noted that this trajectory conflicts with the SHLAA assessments of several of these sites, both in terms of site capacities and delivery timeframes; in particular where sites are noted in the SHLAA as delivering later in the period being brought forward to earlier years without any additional justification.
- 7.6 Furthermore, this evidence is incomplete as many of these sites have not been put forward in the SHLAA at all and have existing occupiers, multiple ownerships and other constraints; yet there has been no detail of how these issues will be addressed, including where existing businesses might relocate to.
- 7.7 In light of these inconsistencies and gaps in the evidence, we have reviewed each of these parcels in detail and provide our own assessment of each of the 12 Character Areas at **Appendix 1**. In headline terms our assessment concludes that:

- A large proportion of the parcels (56 of 108, or 52%) have more than one landowner, with some having 20 or more titles suggesting there will be land assembly issues, unless the Council is proposing some sort of large scale CPO, which has not been suggested.
- Only 3,383 of this 7,634 unit capacity is on sites that have been put forward for development in the SHLAA, which is just 44%, meaning that 56% has been generated from this masterplanning exercise with little supporting evidence.
- A total of 4,742 of the 7,634 unit capacity is proposed on sites with existing active occupiers, which equates to over 62% of the total, and these include national supermarket operators like Asda and Sainsburys, with no indication that these are intending to close down or relocate.
- Of these units, 1,415 are on sites that have been put forward for development within the SHLAA; however this still leaves 3,327 units that are in active alternative use with no prospect for residential development, and therefore we have deducted these units from the overall supply.
- Of the remaining units proposed for delivery in the first 5 years, 593 are proposed on sites where no planning application has been submitted, and therefore have been moved into the 6-10 year period. Overall this leads to a reduction of 1,030 in the first 5 years and 1,646 in the first 10 years.

7.8 As such we provide our own summary trajectory below, which recommends deducting **3,327** units from the 7,634 suggested across the City Centre and Waterfront; including **1,646** units from years 1-10, unless significant additional evidence is provided to justify the delivery rates proposed.

*Fig 7.1 - Pegasus Trajectory (compared to Council's)*

	0-5	6-10	11-15	16-20	TOTAL
City Centre	351	1,074	161	123	<b>1,709</b>
Waterfront	327	734	881	580	<b>2,522</b>
COMBINED TOTAL	678	1,808	1,042	703	<b>4,231</b>
City Centre deductions	- 629	- 555	- 408	- 225	- 1,187
Waterfront deductions	- 401	- 61	- 909	- 139	- 1,510
COMBINED TOTAL DEDUCTIONS	-1,030	- 616	- 1,317	- 364	<b>- 3,327</b>

7.9 This masterplanning exercise also raises a series of wider issues. Firstly, it is clear that the proposed redevelopment will involve the closure or relocation (either temporary or permanent) of numerous shops and supermarkets, including Asda, Sainsburys, Lidl and Iceland; however there has been no evidence provided on how this will impact on the Council's retail growth aspirations. This is compounded by the fact that paragraph 2.35 acknowledges that the latest Retail and Leisure Needs

Assessment pre-dates the Council’s latest OAN requirements and proposed housing growth locations, which will inevitably increase the demand for such services.

- 7.10 Therefore, as things stand, the Council’s retail need is going to increase significantly to cater for the housing growth proposed in the emerging plan; yet some of the existing retail provision is going to be lost to cater for this growth, which directly undermines Strategic Objective 3 as we mention in section 4. As such, the Council must clarify this position and provide updated retail evidence as soon as possible.
- 7.11 Secondly, introducing significant residential development into established commercial areas in a piecemeal way is going to generate amenity issues and operational conflicts with existing uses. The established commercial uses are unlikely to have any restrictions on noise, HGV movements or other operations, which could well create disturbance for new residents or deter developers from investing entirely; whilst future commercial operators may look to locate elsewhere to avoid more restrictive conditions being applied in the future to take account of proposed residential development. Again, this matter will need further investigation and clarification from the Council.
- 7.12 Finally, we see no evidence which suggests or confirms the Council will use CPO powers to bring forward such sites. As such, the availability and deliverability of these sites cannot be relied upon.

**Wider Urban Area**

- 7.13 Table 15 sets out proposed delivery from the wider urban area, which is supposedly based on the SHLAA; however no detailed trajectory is provided and the SHLAA does not separate these sites from others in the City Centre or Waterfront, and also includes some of the non-Green Belt, HCA land in the Garden Suburb, making a detailed analysis and comparison very difficult, and also suggesting there may be some double counting.
- 7.14 We also note that in the case of the City Centre and Waterfront the proposed trajectory did not accurately reflect the SHLAA Assessment (where several sites had been brought forward to begin delivering earlier); so we would ask that the Council clarify on this matter.

	0-5	6-10	11-15	16-20	Total
Wider Urban Area	1,560	2,271	1,038	0	4,869

- 7.15 We counted 109 sites within the SHLAA that were not included in the City Centre/ Waterfront calculations, which gives an average site yield of 44. Given this modest site size and dispersed nature of these sites around the authority area, it is not entirely unreasonable to assume that the majority could deliver within the first 10 years. Although, we would need the Council to provide more evidence on this through the preparation of a ‘site by site’ trajectory.

### **South Western Warrington Urban Extension**

7.16 Table 23 sets out proposed delivery from the South-Western Warrington Urban Extension, which is based on the Call for Sites and SHLAA Assessments and Framework Plan Document prepared by AECOM.

	0-5	6-10	11-15	16-20	Total
South West Extension	0	610	610	611	1,831

7.17 As part of this, two options are proposed:

- Option 1 – With 'Western Link' crossing the Ship Canal, and 1,831 residential units;
- Option 2 – Without 'Western Link' crossing the Ship Canal, and 1,892 residential units.

7.18 This urban extension is also expected to provide a 20 Ha local park, a Local Centre, a Primary School and 31 Ha of open space which we fully welcome.

7.19 The supporting text and documents note that further highway capacity work is needed to confirm which option will be pursued and the trajectory that will be achieved; however, the lower (with link road) total has been used for now.

### ***Western Link Canal Crossing***

7.20 Indeed, whilst we acknowledge that more detailed technical analysis is required, it is our strong view that an additional crossing of the Ship Canal should be provided; given that the three existing crossings are already known to be pinch points generating major congestion issues; whilst the plan as drafted proposes over 9,000 units south of the Ship Canal which will obviously exacerbate these issues unless further provision is made. Given this Western Link is the only option currently proposed and considered achievable in the plan, to not provide it would represent a missed opportunity and could generate severe highways impacts in the future in conflict with Strategic Objective W4.

7.21 If the link road is to be provided, it's implementation will need to be carefully managed and phased alongside the associated development, which could have implications on delivery and viability.

7.22 In terms of delivery, this is clearly a large strategic allocation, requiring significant supporting infrastructure and service delivery, with or without the link road, and therefore issues of phasing and trajectory need careful consideration. No detail or justification has been provided by the Council at this stage, so we provide our own analysis below.

### ***Delivery on Urban Extensions***

7.23 Our assessment draws upon evidence on lead in times and build-out rates for large residential sites from the following three reports/assessments, which are all based a large amount of empirical data:



- A Report into the Delivery of Urban Extensions (Hourigan Connolly, February 2014).
- Urban Extensions, Assessment of Delivery rates (Savills, October 2014).
- Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? (NLP, now Lichfields November 2016).

7.24 The Hourigan Connolly report on the delivery of urban extensions highlights the difficulties and time it can take to bring forward such sites. It is worth highlighting the following key factors as reported in Section 15 of that document, namely the average times for the various stages of the planning process. These are:

- Average timescale from submission to grant of outline planning permission is 34 months.
- Average timescale for signing a legal agreement 24 months.
- Reserved matters applications 6-9 months.

7.25 Subsequent to that report, the Savills report looks at urban extensions and their delivery rates. In terms of lead in time the report is clear that a period of 3-4 years from the determination of an outline planning application to the completion of site preparation and the delivery of housing is a realistic average time scale for the delivery of housing. The study notes that sites which have particularly complex land packages and or significant strategic infrastructure to deliver can take significantly longer than estimated. The report lists examples of sites where Section 106 agreements in themselves have taken 64 months to agree, with the average being 14 months.

7.26 The Savills report goes on to consider how fast a major site may build out. On average, it found that in the first year of construction a site delivered 65 units, this increased to 110-120 dwellings per annum in subsequent years, before dropping towards the end of the life cycle of the development. These rates are obviously averages and dependant on a range of factors, however the report makes clear that any spikes on sites considered within the report were down to very specific delivery factors, for example the need to deliver a large lump of affordable housing in one go due to the funding requirements of a partner.

7.27 The Lichfields report relates to housing delivery and assesses 70 large schemes (500 homes +) which have come forward in the last 20 years, and 83 smaller sites (50-499 homes). The report commented on average delivery from conception to start on site, looking at:

- Lead in time prior to submission of an application.
- Planning approval period.
- Annual build out rates.

7.28 The average lead-in time to first planning submission for large sites is identified by Lichfields as 3.9 years (i.e. from the point a site is first identified in a Local Plan).

7.29 Within the Lichfields report, the planning approval period is then measured from the validation date of the first application for the proposed development, with the end date being the decision date of the first detailed application which permits the development of dwellings on site. The Lichfields report also identifies the period of time which typically elapses from planning approval to the delivery of the first dwelling on site. The planning approval period of all sites, both large and small, is identified by Lichfields as:

- 2.8 years (0-99 homes).
- 4.1 years (100-499 homes)
- 5.3 years (500-999 homes)
- 5.6 years (1,000-1,499 homes)
- **6.5 years (1,500-1,999 homes)**
- 6.9 years (2,000+ homes)

7.30 Lichfields also identify the annual build-out rate within the overall build period of each site. The annual build out rates are influenced by the size of the site and NLP arrives at the following:

- 27 dwellings per annum (dpa) (0-99 homes);
- 60 dpa (100-499 homes);
- 68 dpa (500-999 homes);
- 105 dpa (1,000-1,499 homes);
- **135 dpa (1,500-1,999 homes);**
- 161 dpa (2,000+ homes).

7.31 There are clear comparable and common themes running through each of the three assessments. In short, large sites take time to deliver, typically because of competing land owners and interests, the requirement for up-front infrastructure, and the complexity of such projects. This is not to say that they are not necessary to delivery housing needs but the Warrington Local Plan needs to be based on realistic housing trajectories to ensure needs are met in full over the plan period.

7.32 Given Lichfields assessment is the most recent, we have based our own assessment for the South Western Warrington Urban Extension on their findings, assuming a base date of July 2017 from which to measure lead in times, as the time when the site was first identified in a Local Plan (i.e. 0.25 years into the plan period, which started in April 2017). As part of this housing trajectory assessment we have not assessed the suitability or deliverability of the site in detail, we have simply applied the Lichfields methodology to highlight the extent of shortfall that could be experienced by just applying the empirical data supplied in their report.

7.33 In this instance, there are 1,831 (or 1,892) units proposed, so the methodology would suggest a lead in time of 10.4 years (3.9 + 6.5 years as highlighted), which would see delivery beginning <sup>2</sup>/<sub>3</sub> of the way through 2027/28, then continuing at 135 dpa, as per the below:

*Fig 7.2 –Trajectory for South West Extension following Lichfield Methodology*

Year 1	Years 11-15					Years 16-20						
17/18	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	TOTAL	Beyond plan
-	47	135	135	135	135	135	135	135	135	135	<b>1,262</b>	<b>569</b>

Years	0-5	6-10	11-15	16-20	TOTAL
South West Extension	0	0	587	685	<b>1,262</b>

South West Deductions	0	- 610	- 23	+ 74	- 569
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7.34 By way of a sense check, these lead-in times are considered reasonable for this site given the level of supporting infrastructure, particularly the link road; whilst the delivery rates do not seem unrealistic given the fact the land currently only has 3 parties promoting it, and the relatively compact nature of the site and limited access points, would not lend itself to multiple outlets (i.e. more than 3).

7.35 As such, we consider this approach robust at this stage and would suggest total delivery of 1,262 within the plan period, with a further 569 beyond; and as such we suggest 569 is deducted until further evidence is provided.

### **Warrington Garden City Suburb**

7.36 As noted earlier in this document, and within our site-specific representations on Reddish Hall Farm, we support the identification of this allocation and note that the identification of significant employment land, schools and a District Centre within the allocation will provide a level of self-sufficiency and reduce pressure on the Warrington Urban Area in terms of commuting and associated congestion.

7.37 We also welcome the high level masterplanning work undertaken to date; albeit this will need to be explored in significantly more detail before the next version of the plan is released and will require input from all landowners and developers involved. Indeed, it is suggested that some clarity is provided over how this strategic allocation will be managed and brought forward and whether this will require a separate DPD/Area Action Plan document, as this could obviously have implications on delivery. A more coherent analysis of individual land parcels would assist in demonstrating a robust phasing programme for delivery.

7.38 In terms of delivery, the Council set out their trajectory in Table 19, which is based on the Call for Sites and SHLAA Assessments and Framework Plan Document prepared by AECOM.

	0-5	6-10	11-15	16-20	Total
Garden City Suburb	406	496	48	0	950
Garden City Suburb (Green Belt)	0	2,114	2,096	2,114	6,324
<b>TOTAL</b>	<b>406</b>	<b>2,610</b>	<b>2,144</b>	<b>2,114</b>	<b>7,274</b>

7.39 We have then applied the Lichfields methodology to this allocation for comparison purposes. In this instance, there are 7,274 units proposed; however 950 of those are on HCA land that is not within the Green Belt and can (and is likely to) be brought forward independently of this allocation as some have been consented already.

7.40 As such, we are focussing on the Green Belt land within the Garden Suburb, totalling 6,324 units. This scale would suggest a lead in time of 10.8 years (3.9 + 6.9 years as previously highlighted), which would see delivery beginning in 2028/2029, continuing at 161 dwellings per annum.

Fig 7.3 - Trajectory for Garden Suburb following Lichfield Methodology

Year 1	Years 11-15					Years 16-20						
17/18	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	TOTAL	Beyond plan
-	-	161	161	161	161	161	161	161	161	161	<b>1,449</b>	<b>4,875</b>

Years	0-5	6-10	11-15	16-20	TOTAL
Garden Suburb (Green Belt)	0	0	644	805	<b>1,449</b>
Garden Suburb Deductions	0	- 2,114	- 1,452	- 1,309	<b>- 4875</b>

7.41 This provides a somewhat alarming sense check and highlights that the Council will have to work very closely with owners and the development industry to fast track development at the pace currently envisaged in the Local Plan. Indeed, the annual delivery rates and commencement date for development of Green Belt land is likely to be highly scrutinised and subject to criticism unless there is robust and coherent justification in place.

7.42 As such, we would recommend that an early meeting is arranged by the Council with all land owners and promoters to facilitate this shortly after the closure of this current consultation period.

7.43 With proactive engagement between all interested parties, Taylor Wimpey consider delivery rates could be considerably higher than 161 per annum. This is because the site is substantially larger than the 2000+ category used by Lichfield's and benefits from a good number of access points and an existing internal road structure, meaning there is scope for a substantial number of sales outlets.

A critical part of the strategy will be to facilitate the early delivery of sites/parcels that open up land parcels that are currently inaccessible (either due to constraints on the existing network or by virtue of being land-locked).

- 7.44 In the case of Taylor Wimpey’s land interests within the Garden Suburb, the Council should note that all three parcels have direct access onto the existing road network.
- 7.45 The Council assume an average of 420 dpa from year 6 onwards, which is based on 6 or more housebuilders/sales outlets delivering at the same time with each delivering 70 dwellings per annum. Given each developer will be almost side by side, there could be an issue of local market saturation at this level, hence why we consider there are considerable advantages in providing a greater number of sites through a more dispersed development strategy.
- 7.46 Nevertheless, this is not too dissimilar to our own assessment of the site where we have concluded that there is a possibility that 300 to 400 units could be delivered year on year.
- 7.47 The critical issue will relate to whether the Council can genuinely facilitate early delivery on the site’s current Green Belt sites. Indeed, the Lichfield approach and lead in time of 10.8 years would push the bulk of delivery back to years 11-20.
- 7.48 This would lead to a total of 2,700-3,600 dwellings being delivered on the Green Belt part of the Garden Suburb within the plan period based on 300-400 dwellings per annum (plus the additional 950 units on non-GB land). This would leave 2,724-3,624 units being delivered beyond the plan period, which highlights the need for early, co-ordinated action from the Council.

Fig 7.4 – Pegasus Trajectory for Garden Suburb using NLP Lead in Times

Year 1	Years 11-15					Years 16-20						
17/18	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	TOTAL	Beyond plan
Option 1	-	300	300	300	300	300	300	300	300	300	<b>2,700</b>	<b>3,624</b>
Option 2	-	400	400	400	400	400	400	400	400	400	<b>3,600</b>	<b>2,724</b>

Years	0-5	6-10	11-15	16-20	TOTAL
Garden Suburb (Green Belt)	0	0	1,200-1,500	1,500-2,000	<b>2,700 – 3,600</b>
Garden City Suburb (Urban)	406	496	48	0	<b>950</b>
Total	406	496	1,248-1,648	1,500-2,000	<b>3,650 – 4,550</b>

Option 1 Deductions	0	- 2,114	- 944	- 614	<b>- 3,624</b>
Option 2 Deductions	0	- 2,114	- 644	- 114	<b>- 2,724</b>

### ***Safeguarded Land***

7.49 Whilst we agree with the principle of safeguarded land, we disagree with its grouping of within one area north of Junction 20 of the M6. In our view, this should either be dispersed more evenly across the Borough to provide greater opportunity for different part of Warrington and the Borough to grow beyond the plan period. Alternatively, it should be relocated to the south of Grappenhall Lane within the Garden Suburb based on existing development patterns and defensible Green Belt boundaries. This issue will be covered in greater detail in our site-specific representation relating to Reddish Hall Farm.

### **Outlying Settlements**

7.50 As noted in section 6, we agree with the principle that the outlying settlements would be capable of accommodating at least 1,000 units; and it is perfectly feasible that they could accommodate more development and still support the aspirations of the New City, rather than compromising it.

7.51 Whilst we have not analysed the Green Belt capacities of individual settlements at this stage, we note that these are indicative and therefore we reserve the right to make further comments in the future.

7.52 In terms of delivery rates, as with the wider urban area, whilst the Council have not provided any evidence to support the proposed trajectory and delivery rates, these do not seem unrealistic given the smaller scale dispersed nature of these sites, which are far more likely to come forward within the next 10 years.

### **Conclusions**

7.53 Please note this analysis is indicative at this stage based on the available evidence and existing empirical studies. As such it does not make any firm conclusions on actual numbers. Instead it simply highlights the deliverability issues and challenges that face the plan as drafted, particularly in respect of delivery in the early years in the urban area and the two large urban extensions, and where additional evidence is required.

7.54 In light of this, we reserve the right to make further comments once additional evidence is provided.

## **8. CONCLUSIONS**

### 8.1 Overall, we support:

- the Council's promotion of a housing target that exceeds that set out in the 2016 SHMA to meet the objectives of the LEP's Strategic Economic Plan and consider this to be an entirely sound approach to meeting development needs of the Borough,
- the exceptional circumstances cited by the Council to support Green Belt Release for housing and employment development.
- the identification of the Warrington Garden Suburb settlement but note that the Council will need to carry out detailed consultation, meetings and masterplanning process with the interested parties if it is to achieve the delivery rates currently envisaged, which will be a real challenge unless a proactive approach is taken.

### 8.2 We object to:

- The lack of a spatial development option that focuses on locations that are most accessible to public transport nodes and hubs (in this case Warrington's rail stations and network);
- the Spatial distribution of proposed development land and safeguarded land. We consider a more dispersed approach should be taken to include a greater number of development sites around Warrington and potentially the other outlying settlements (subject to further consultation on the other settlements).
- the lack of development land identified which is based on unrealistic developable land ratios and densities for the Green Belt sites;
- the lack of Safeguarded Land identified on the basis of not planning for a sufficiently long period beyond the 20 year horizon of the proposed Local Plan, developable land ratios, development densities, and other issues;
- the grouping of Safeguarded Land within one area north of Junction 20 of the M6. It is considered this should either be dispersed more evenly across the Borough to provide greater opportunity for different part of Warrington and the Borough to grow beyond the plan period. Alternatively, it should be relocated to the south of Grappenhall Lane within the Garden Suburb based on existing development patterns and defensible Green Belt boundaries.
- the unjustified high level of housing delivery within Warrington City Centre within the plan period and the fact that all evidence points to the fact that this will not be achievable;
- the expected levels of delivery on the SW Warrington Urban Extension, which are considered overly optimistic given the need for a new road/bridge over the Ship Canal;

- the lack of development land available to the west of Warrington despite it scoring highly in the Sustainability Assessment and parcels of green belt land being available that do not make a strong contribution to the 5 purposes of Green Belt.



**APPENDIX 1- PEGASUS DELIVERABILITY ASSESSMENT/ TRAJECTORY**

### Stadium Quarter

Located to the north of the city centre, the Master Plan anticipates the creation of high quality residential communities supported by new commercial, educational and leisure uses with close links to the town centre.

However there are a large number of identified parcels within the Stadium Quarter (for example the ASDA warehouse on parcels A3-A6) which contain established and successful operations. Given the likely lease periods on these plots it is not expected that existing uses will be redeveloped within a 6-10 year timeframe as would be needed to accommodate the large scale residential development envisaged.



Parcel Ref	Parcel Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use	SHLAA	No of Landowners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL
A1	0.31	Years 6-10	20	24		100%	Trailer Storage Area associated with the adjacent Asda Warehouse	N/A	CH350474 (1 main landowner) ASDA stores		This site was previously occupied by ASDA as a distribution centre; however we understand they surrendered their lease in early 2017 and have vacated. That said, it could well be re-occupied for commercial use, and the area has not been put forward for residential in the SHLAA so is removed from the trajectory.	0	0	0	0	0
A2	0.71	Years 6-10	35	55	Residential	100%	Part of the ASDA warehouse, trailer storage area and office building	N/A	CH350474 and CH648360 (2 main landowners) ASDA stores and one other although this land is operated by ASDA			0	0	0	0	0
A3	0.51	Years 6-10	20	19	Residential	100%	ASDA Warehouse	N/A	CH350474 - 1 main landowner			0	0	0	0	0
A4	0.45	Years 6-10	20	17	Residential	100%	ASDA Warehouse	N/A	CH350474 - 1 main landowner			0	0	0	0	0
A5	0.72	Years 6-10	20	27	Residential	100%	ASDA Warehouse and trailer storage	N/A	CH350474 - 1 main landowner			0	0	0	0	0
A6	0.8	Years 6-10	20	44	Residential	100%	Offices/Business Centre, Car Park and part of Warehouse	N/A	CH648360, CH350474, CH355774 - 3 main landowners			0	0	0	0	0
A7	1.17	Years 6-10	35	109	Residential	100%	Car Park and Small Warehouse	N/A	CH491236, CH350474, CH355774, CH358241 - 4 main landowners			0	0	0	0	0

A20	1.93	Years 6-10	55	200	Mixed-Use	82%	Car Park, Pub, Convenience Store, Car Wash	1401 - in for 20 in years 6-10	13 different landowners	2005/07132- listed in SHLAA- mixed use development including residential	Is in the SHLAA and has historic resi. consent, although is still occupied, so has retained.	0	200	0	0	200
A21/22	1.02	Years 0-5	35	129	Residential	100%	Derelict site where development looks to be taking place, kebab shop, car park, furniture shop, fish and chip shop, appliances store.	1029 - considered in years 6-10 for 42 units- lists planning app 2007/09337 for 284 units	10 different landowners:	2017/31073 - Screening Opinion for Mixed Use Development. Decision decided Sept 2017 that an EIA is not required. Application for 362 apartments	Site is in SHLAA with resi. app submitted, so has been retained.	129	0	0	0	129
A24	1.13	Years 0-5	35	71	Mixed-Use	50%	The majority of the site appears to be occupied by derelict buildings and with a business (Millside) operating on site and a network rail building.	2480- Consider 11-15 years. Capacity 38 units.	8 different landowners	2017/31120 - Application for Car Rental Garage. Approved with condition 14/07/2017	Site is in SHLAA but in years 11-15 and also has 2017 consent for alternate use, so have moved to years 6-10	0	71	0	0	71
A25	0.31	Years 0-5	20	20	Mixed-Use	50%	Small warehousing/office space (electricity services etc)	2681-in 6-10 years. Capacity 38 units.	2 different landowners (CH167090 and CH370210)	None	In SHLAA but no evidence for an application so have moved to years 6-10	0	20	0	0	20
A26	0.28	Years 0-5	20	18	Mixed-Use	50%	Office Building (The Boultings) which is a relatively new building/development	N/A	14 different landowners	None	This building on the corner looks to be relatively new (Built around 2014) and houses a number of offices. Is occupied, is not in the SHLAA so is removed.	0	0	0	0	0
A27	0.19	Years 6-10	20	12	Mixed-Use	50%	Associated Car Park with the adjacent retail park	2471 - Recommended capacity 74. Long term development over 11-16 years	1 landowner (CH446338)		Whilst retail park and the associated car park look to be operating well, it has been put forward for resi in the SHLAA, so is included.	0	12	0	0	12
A28	1.69	Years 6-10	20	21	Mixed-Use	10%	Small retail park containing softology, carpet right, CSL and Wickes		2 landowners (CH446338 and CH328823)			0	21	0	0	21
A30	0.61	Years 6-10	35	58	Mixed-Use	75%	Majestic Wine Warehouse, Johnsons Dry Cleaning Services and a small car parking area	2682- Rec. capacity 80 over 11-15 years	3 landowners (CH449538, CH328828, CH422148 and CH516341)		Operating well and successfully and show no signs of closure or reduced sales levels; however land has been put forward for resi in the SHLAA, so is included.	0	58	0	0	58
A31	0.41	Years 11-15	20	18	Residential	100%	Car Sales Garage and Forecourt		1 landowner (CH607080)			0	0	18	0	18
A32	0.34	Years 11-15	20	15	Residential	100%	Car Sales Garage and Forecourt		1 landowner (CH340428)			0	0	15	0	15
<b>12.58</b>				<b>857</b>								129	382	33	0	544

amount and proportion occupied

724 84.48 133



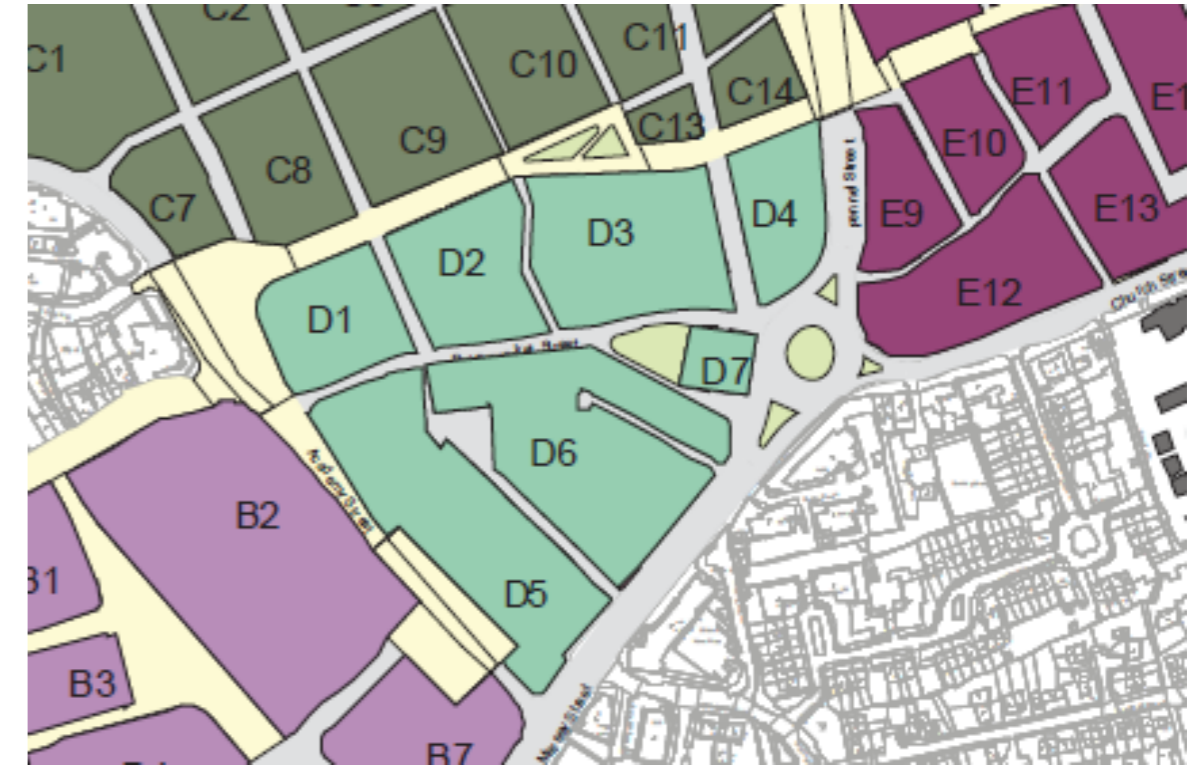




### St Mary's Quarter

The identified parcels are currently occupied by established uses which are likely to have long leases. It is noted that there are a large number of land owners over the plots.

The sites are also within close proximity to St Mary's Shrine Church, which constrains future potential development.



Parcel Reference	Parcel Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use	SHLAA	No of Landowners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL
D1	0.41	Years 0-5	20	41	Mixed Use	80%	Large office block	2673- considered Suitable for development over 6-10 year. For a capacity of 110.	3 landowners (CH259450, CH103037, CH10640)	None	Whilst site has been put forward in SHLAA, there is no planning permission to suggest delivery in 5 years, so we have moved it to year 6	0	41	0	0	41
D2	0.48	Years 6-10	20	48	Mixed Use	80%	Car Park and Bar		9 landowners		Site is in SHLAA, so is included in years 6-10	0	48	0	0	48
D3	0.75	Years 6-10	20	19	Mixed Use	20%	Residential Blocks in a good condition	N/A	7 landowners		Existing residential block in good condition. No evidence of redevelopment and has not been put forward in the SHLAA so is removed	0	0	0	0	0
D4	0.34	Years 6-10	20	32	Mixed Use	75%	Pure Gym	2474- 39 capacity. Developable in longer 11-15 year term.	1 landowner (CH504784)		Site is in SHLAA and in a single ownership, so is included in years 6-10	0	32	0	0	32

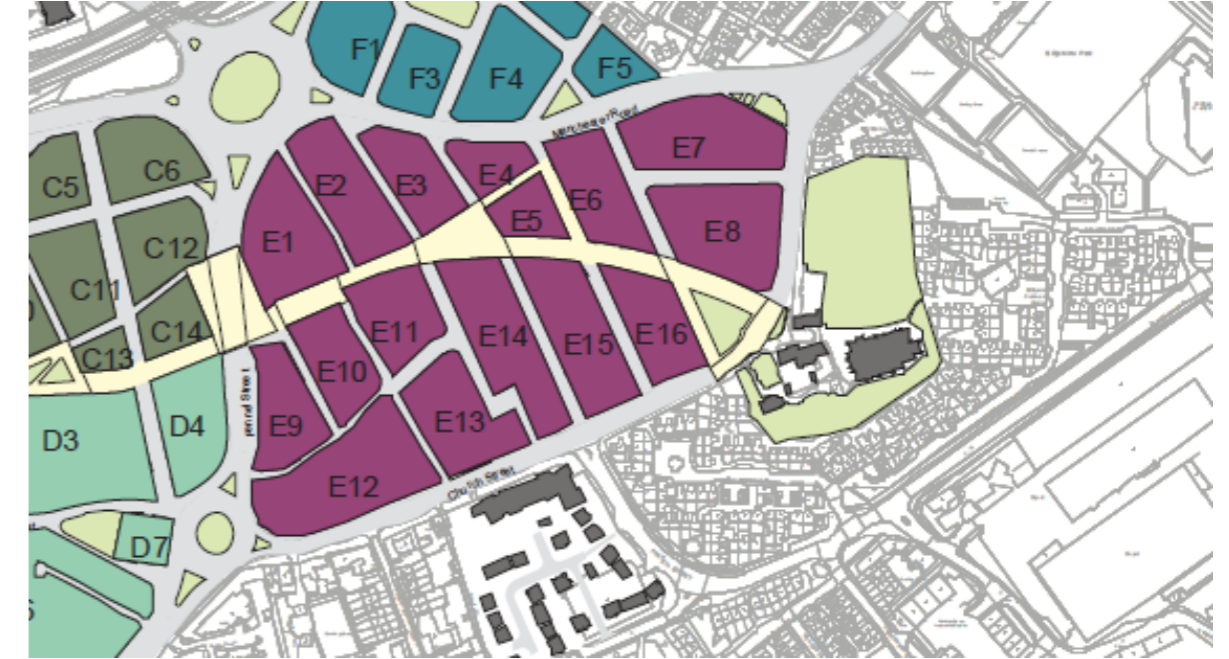




### St Elphin's Quarter

There are a number of established commercial uses within the site including a Sainsbury's superstore and petrol station. Therefore some site remediation will be required if residential uses are proposed. Other supermarkets include a Lidl and Farm Foods.

There are a number of landowners across the quarter. It is expected that the existing uses will be subject to long leases with extend beyond the Plan period.



Parcel Reference	Parcel Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use	SHLAA	No of Landowners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL	
E1	0.43	Years 6-10	20	27	Mixed Use	50%	Retail/ showroom unit and some disused buildings	2477- recommended capacity 33 in years 11-15	8 landowners		Is occupied but in the SHLAA, so is retained.	0	27	0	0	27	
E2	0.39	Years 6-10	20	23	Mixed Use	75%	Dreams, farmfoods and office outlet	2481- considered developable over 11-15 years for 42 units.	3 landowners (CH389531, CH328823, CH443759)		Is occupied but in the SHLAA, so is retained.	0	23	0	0	23	
E3	0.27	Years 6-10	20	20	Mixed Use	90%	Car Park					Is unoccupied and in the SHLAA so is retained.	0	20	0	0	20
E4	0.15	Years 11-15	20	19	Mixed Use	100%	Open space	N/A	4 landowners (CH520286, CH565969, CH335524 and CH386937)		Whilst it is not in the SHLAA, the site is vacant and no obvious reason why it couldn't be included in the longer term.	0	0	19	0	19	
E5	0.15	Years 11-15	20	19	Mixed Use	100%	Sainsburys Store and associated car park and PFS	N/A	2 landowners (LA141916 and CH629012)		Is occupied by a national foodstore chain and not in SHLAA, so is removed.	0	0	0	0	0	
E6	0.33	Years 11-15	20	15	Mixed Use	100%						2 landowners (LA141916 and CH629012)	0	0	0	0	0
E7	0.47	Years 11-15	20	21	Mixed Use	100%						1 landowner (LA141916)	0	0	0	0	0
E8	0.5	Years 11-15	20	23	Mixed Use	100%						2 landowner (CH207251 and LA141916)	0	0	0	0	0
E9	0.3	Years 6-10	20	30	Mixed Use	80%	Lidl and car park	N/A	1 landowner (CH235040)			0	0	0	0	0	

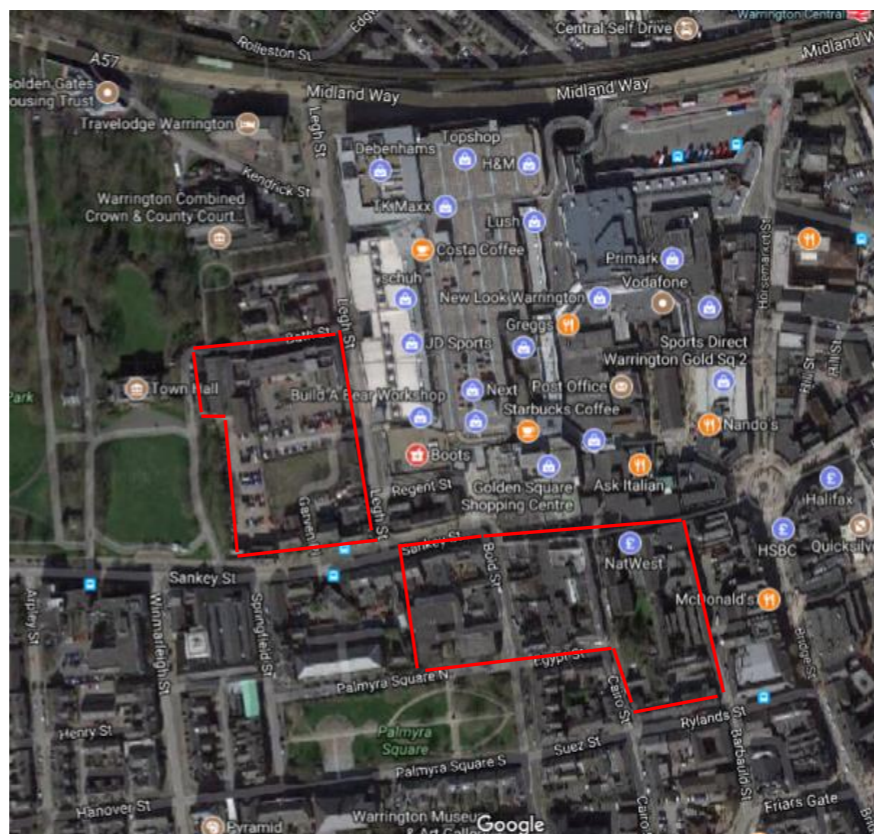




### Cabinet Works

Central location development, partially located within a Conservation Area and includes part of Warrington's main retail centre. In general properties comprises ground floor commercial uses with offices and some residential uses above. A nightclub is located on Bold Street.

There is a large proportion of town centre employees within this location, include the NHS Wellbeing Centre within Parcel G1 comprises.



Site Reference	Site Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use		No of land owners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL
G1	0.78	Years 0 to 5	35	79	Mixed Use	80	A1, A2, A3 ground floor uses, C3, B1 above. Article 4?	2472-capacity of 15 dwells. Considered developable over 6-10 years	18 landowners	2017/31128 - Registered 30/08/2017 - Full Planning and demolition of an unlisted building in a conservation area - Proposed replacement of damaged/collapsed Roofs and Chimney, dismantling of existing archway wall and stone, stored to be rebuilt and Change of use from B1 to A3 & A4	No resi proposed as part of current application; but is proposed within the SHLAA (although only for 15 units in central part of the site) so is retained but pushed back to years 6-10	0	79	0	0	79

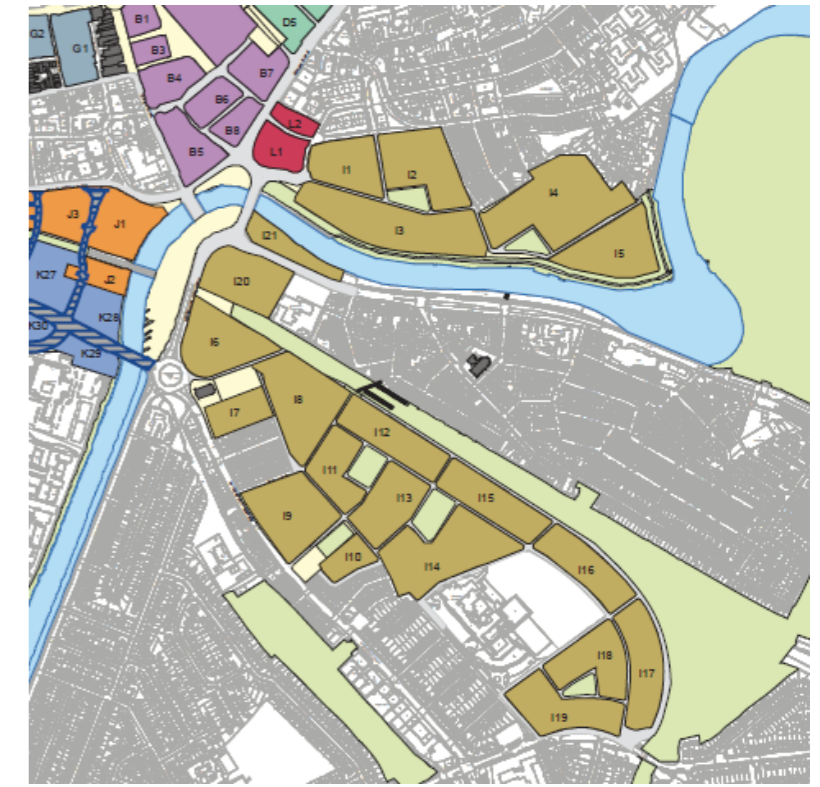




### Southern Gateway

The Area connects the north and south of the River Mersey. The northern section comprises the established Riverside Retail Park.

To the south of the River the uses are more industrialised, comprising large scale B2 and B8 uses over parcels subject to multiple land owners. There is little to no consistency in the urban form within this area.



Site Reference	Site Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use		No of land owners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL
I1	1.02	Years 11-15	35	63	Residential	100	Homebase	N/A	CH409546		These parcels are all occupied, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0
I2	1.45	Years 11-15	20	46	Residential	100	Loading bay large A1 uses	N/A	CH409546			0	0	0	0	0
I3	2.25	Years 6 to 10	35	101	Residential	100	Car park ancillary to retail uses. Some A3/5 establishments including drive-through McDonald's and Harvester	N/A	CH409546			0	0	0	0	0
I4	2.45	Years 0 to 5	35	77	Residential	100	large scale B2, B8 uses.	N/A	CH92577	None		0	0	0	0	0
I5	1.35	Years 0 to 5	35	52	Residential	100	large scale B2, B8, D2 uses. Including a brewing company, smash repairs and flooring company.	N/A	CH92577	None		0	0	0	0	0

Site Reference	Site Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use		No of land owners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL
I8	1.68	Years 0 to 5	20	15	Residential	20	large carpark ancillary to industrial uses, brownfield-former RLFC ground	1752 and 1753 - combined capacity of 109 units, beginning delivery years 11-15	CH401914, CH434451	None	Is unoccupied and in the SHLAA so is retained, but is pushed back to years 6-10 given there is no evidence of a planning application and site may well have ground condition issues.	0	15	0	0	15
I11	0.87	Years 0 to 5	20	42	Residential	100	B8, B2 uses	N/A	CH434451	None	Site is occupied, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0
I12	1.15	Years 0 to 5	35	76	Residential	100	half waste land, half B2, B8 uses	N/A	CH434451	None	Is unoccupied so is retained, but is pushed back to years 6-10 given there is no evidence of a planning application.	0	76	0	0	76
I13	1.11	Years 16 to 20	20	38	Residential	100	B8, B2 uses	N/A	CH658898		Parcels are all occupied, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0
I14	1.98	Years 16 to 20	35	89	Residential	100	B8, B2 uses	N/A	CH289701, CH520175, CH520174, CH238821, CH5526685, CH258368, CH355007, CHH2869812, CH97658, CH3346434, CH592613, CH479205, CH36281, CH289750n, CH398600, CH592826, CH335187			0	0	0	0	0
I15	1.14	Years 16 to 20	35	98	Residential	100	B2/B8 uses	N/A	CH242815, CH255677, CH470205, CH288457, CH211940, CH273618, CH321619, CH286675, CH288454			0	0	0	0	0

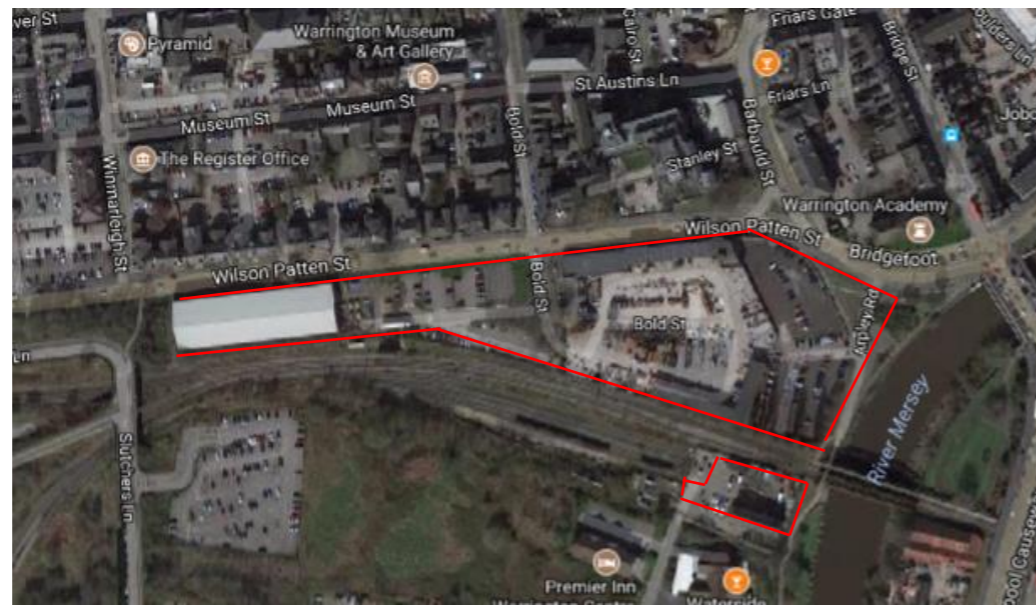


116	1.06	Years 11-15	35	91	Residential	100	Greenfield	N/A	CH44159		The site is vacant so no obvious reason why it couldn't be included in the longer term.	0	0	91	0	91
117	1.21	Years 6 to 10	20	38	Residential	100	B2/B8 uses	N/A	LA349468, CH353664		Parcels are all occupied, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0
118	1.12	Years 6 to 10	20	35	Residential	100	B8 uses	N/A	CH353804, LA349468			0	0	0	0	0
119	1.26	Years 6 to 10	20	40	Residential	100	B8 uses	N/A	CH353804, LA349468			0	0	0	0	0
				<b>21.1</b>								0	91	91	0	182
					719	79.80	182									

### Arpley Road

The area is located on the southern side of Wilson Road and to the north of the railway line (with the exception of one parcel on the opposite side of the track) much of the rear identified has a riverside frontage.

There are large scale operational uses on the site, including a 'GO Outdoors' with associated car parking and a trade centre.

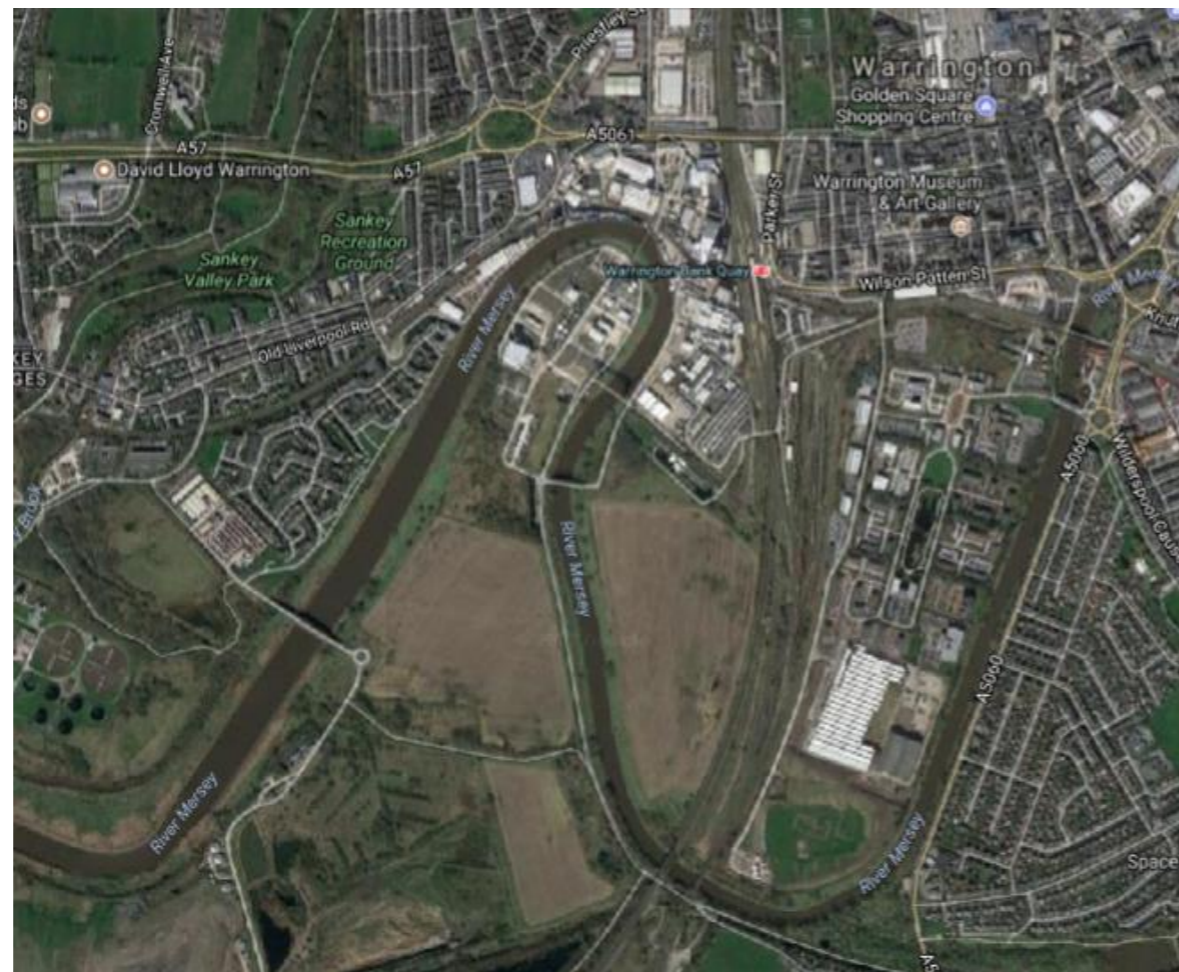


Site Reference	Site Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use	SHLAA	No of land owners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL	
J1	1.1	Years 0 to 5	35	125	Mixed Use	90	CCP Car park, landscaped space	2672-Site not considered suitable at present but developable in 6-10 years	3- CH271544, CH248441, CH592944	2017/30394 - Decision issued 07/06/2017. Request for an EIA Screening Opinion: PROPOSED MIXED USE/RESIDENTIAL DEVELOPMENT; CONSTRUCTION OF TWO NEW APARTMENT BLOCKS FOR 126 APARTMENTS AND LEISURE/ COMMERCIAL UNITS (USE CLASSES A1/A3/A4/D2).	This site is in the SHLAA and has recent planning permission for 126 apartments so is retained.	125	0	0	0	125	
J2	0.42	Years 16-20	20	48	Mixed Use	90	B8/storage yard		No owner identified			These parcels are all in the SHLAA and look to have good redevelopment potential so they are retained.	0	48	0	0	48
J3	0.81	Years 16-20	35	102	Residential	100	Tyre depo		CH530051				0	102	0	0	102
J4	0.55	Years 16-20	35	69	Residential	100	Go Outdoors Car Park		CH607511				0	0	0	69	69
J5	0.48	Years 16-20	35	54	Mixed Use	90	Go Outdoors		CH607511				0	0	0	54	54
	<b>3.36</b>			<b>398</b> <b>273</b>		<b>125</b>						125	150	0	123	398	

### Warrington Waterfront Development Area

The WWDA area is centred around much of the Mersey River meander. This area has previously contained industrial uses and is well connected to the city centre.

Many of the parcels identified have waterside borders.



Site Reference	Site Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use	SHLAA	No of land owners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL
K1	2.81	Years 11-15	55	266	Mixed Use	75	Lidl	N/A	CH487189		Site is occupied by Lidl, is not in the SHLAA and no evidence of a planning application, so is removed.	0	0	0	0	0
K2a	2.9	Years 11-15	55	275	Mixed Use	75	Unilever, PQ Corp, B2/B8 uses	N/A	CH369744		Site is occupied, is not in the SHLAA and no evidence of a planning application, so is removed.	0	0	0	0	0
K2b	1.43	Years 16-20	55	134	Residential	75	Unilever, PQ Corp, B2/B8 uses	N/A	CH369744			0	0	0	0	0

K3	1.14	Years 0 to 5	55	144	Residential	100	Established B8 uses 'Warrington Fabrication'	N/A	12 separate land owners		Site is occupied, is not in the SHLAA, has multiple landowners and no evidence of a planning application, so is removed, unclear why it is included in years 1-5	0	0	0	0	0
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Site Reference	Site Area (hectares)	Year Planned for Development	Planned Density per annum	Expected Yield (dwellings)	Main Use	Percentage Residential	Current Use		No of land owners	Planning History	Comments	0-5	6-10	11-15	16-20	TOTAL
K1	2.81	Years 11-15	55	266	Mixed Use	75	Lidl	N/A	CH487189		Site is occupied by Lidl, is not in the SHLAA and no evidence of a planning application, so is removed.	0	0	0	0	0
K2a	2.9	Years 11-15	55	275	Mixed Use	75	Unilever, PQ Corp, B2/B8 uses	N/A	CH369744		Site is occupied, is not in the SHLAA and no evidence of a planning application, so is removed.	0	0	0	0	0
K2b	1.43	Years 16-20	55	134	Residential	75	Unilever, PQ Corp, B2/B8 uses	N/A	CH369744			0	0	0	0	0
K3	1.14	Years 0 to 5	55	144	Residential	100	Established B8 uses 'Warrington Fabrication'	N/A	12 separate land owners		Site is occupied, is not in the SHLAA, has multiple landowners and no evidence of a planning application, so is removed, unclear why it is included in years 1-5	0	0	0	0	0
K4	5.6	Years 6 to 10	55	214	Residential	100	Low grade greenfield land, haulage storage associated with adjacent sewage treatment works	1633 - suggested capacity for 1105, starting in 2025 with infrastructure	CH106049, CH1429691		Site is unoccupied and in the SHLAA so is retained.	0	0	0	214	214

K5a	4.31	Years 0 to 5	55	165	Residential	100	Low grade greenfield, previously used as a landing stage	delivery (913 programmed beyond 2032)	CH106049, CH429691	2017/29787, approved 07/04/2017 - Full Planning - Proposed reinstatement/ re-use of building for the production of silicate powder including erection of new chimney stack to protrude 4.5 metres above roof and new service pipe bridge at 7m above ground level.	Recent applications all relate to industrial workings, so no evidence to include in years 1-5, but site is in SHLAA so have pushed back to years 6-10.	0	165	0	0	165
K5b	7.19	Years 6 to 10	55	275	Residential	100	Low grade greenfield		CH106049, CH429691		Parcels are unoccupied and in the SHLAA so are retained.	0	275	0	0	275
K5c	2.25	Years 11-15	55	86	Residential	100	Low grade greenfield		CH106049, CH429691			0	0	86	0	86

K6a	6.12	Years 11-15	55	275	Residential	100	B2/B8 uses inc Go Karting, animal welfare,	N/A	up to 20 different owners		Parcels are occupied, not in the SHLAA, have multiple landowners and no evidence of a planning application, so are removed.	0	0	0	0	0
K6b	0.11	Years 16-20	55	5	Residential	100	B2/B8 uses inc Go Karting, animal welfare. All are relatively new but well established businesses.	N/A	up to 20 different owners			0	0	0	0	0
K7a	8.63	Years 11-15	none	365	Residential	100	unoccupied land	1541 - capacity 646? 192 expected	CH347339, CH160169, CH209647, CH414308		Parcels are unoccupied and in the SHLAA so are retained.	0	0	365	0	365

K7b	8.66	Years 16-20	none	366	Residential	100	unoccupied land	before 2032, 454 afterwards	CH347339, CH160169, CH209647, CH414308			0	0	0	366	366
K8	6.12	Years 6 to 10	55	275	Residential	100	Unoccupied land	N/A	CH524919, CH414308		The site is vacant so no obvious reason why it couldn't be included in the longer term.	0	0	275	0	275
K9a	4.32	Years 0 to 5	55	165	Residential	100	Polyflex Packaging (B8)	1715 - suggested capacity of 512 - commencing halfway 2020/21 - delivering 55 a year	CH362049	2017/30982- Opinion issued 08/09. Request for an EIA Screening Opinion - Proposed residential development of 510 dwellings	Parcels are in SHLAA with screening application for 510 dwellings in, as such have been retained	165	0	0	0	165
K9b	4.81	Years 6-10	55	184	Residential	100	Polyflex Packaging (B8)		CH362049			0	184	0	0	184
K10	4.38	Years 0 to 5	55	162	Residential	100	Driving range - no shut		CH365160			162	0	0	0	162
K18	0.7	Years 0 to 5	20	30	Residential	95	car yard, tyre services	N/A	CH57758, LA104805, CH151389, CH318313	None	Site is occupied, not in the SHLAA and is included in years 1-5, yet there is no evidence of a planning application, so has been removed.	0	0	0	0	0

K19	0.59	Years 0 to 5	20	27	Residential	100	car parking and car yard	N/A	Up to 19 different owners	None	The site is vacant so no obvious reason why it couldn't be included in the longer term, but there is no evidence of a planning application so has been pushed back to years 6-10	0	27	0	0	27
K20	0.78	Years 0 to 5	20	35	Residential	100	Jewson	N/A	CH148284	None	Site is occupied, not in the SHLAA and is included in years 1-5, yet there is no evidence of a planning application so has been removed.	0	0	0	0	0

K23	1.71	Years 11-15	35	58	Residential	75	Iceland supermarket, Jehovah's Witness Church	N/A	CH400654,V H424118, CH4208, CH286376, CH448128	Site is occupied by Iceland and others, not in SHLAA, has multiple ownerships and no evidence of a planning application so is removed.	0	0	0	0	0
K25	0.37	Years 11-15	35	35	Residential	75	Operational cargo/haulage company. Site appears to have a long history of haulage. Associated offices also.	N/A	CH448128	Site is occupied, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0
K26	1.64	Years 11-15	55	155	Residential	75	Largely undeveloped land with the exception of the car park. It is expected that the dwellings will be built around the existing uses.	N/A	CH593759, CH154839	Site has potential for redevelopment, and whilst its not in the SHLAA, no reason to prevent it coming forward in the longer term so is retained	0	0	155	0	155
K27	0.92	Years 16-20	35	87	Residential	75	B2/B8, established ground engineering company	N/A	CH1459642, CH514528	Site is occupied, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0
K28	0.58	Years 6 to 10	35	55	Residential	75	Waterside-established Premier Inn Hotel	N/A	CH403895	Site is occupied by a hotel, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0
K29	0.43	Years 6 to 10	20	41	Residential	75	Village Hotel, Warrington. Large, well established hotel.	N/A	CH572068	Site is occupied by a hotel, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0
K30	0.36	Years 6 to 10	20	34	Residential	75	Village Hotel, Warrington. Large, well established hotel.	N/A		Site is occupied by a hotel, not in SHLAA, and no evidence of a planning application so is removed.	0	0	0	0	0







# **WARRINGTON BOROUGH COUNCIL LOCAL PLAN PREFERRED DEVELOPMENT OPTION REGULATION 18 CONSULTATION**

**REPRESENTATION BY TAYLOR WIMPEY (UK) LTD**

**LAND WEST OF STOCKS LANE, PENKETH**

Date: 29<sup>th</sup> September 2017

Pegasus Reference: GL/P16-0574/R005v1

## **Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

**T** 0161 393 3399 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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## 1. INTRODUCTION

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representations to the Warrington Local Plan 'Preferred Development Option Regulation 18 Consultation', which ran between 18<sup>th</sup> July and 29<sup>th</sup> September 2017.

### ***Taylor Wimpey's Land Interest & Proposed Development***

1.2 Taylor Wimpey have a controlling interest in 30.1 Ha of greenfield, agricultural land to the west of Stocks Lane, Penketh. Taylor Wimpey have legal control of the site and are seeking to promote it for residential development through the Local Plan process. The full extent of the site is illustrated below.

1.3 Details of this site have previously been submitted to the 2016 'call for sites' process (Site Ref: R18/138); and it has also been considered within the Green Belt Assessment that supports this plan (Site Refs: WR82), which we refer to later in this document.

*Figure 1.1 – Extent of Taylor Wimpey's Promotion*



1.4 An initial indicative layout is provided in the Illustrative Masterplan, attached at **Appendix 1**, which suggests a site capacity of 600 dwellings, and further detail is provided in section 3 of this report and the Development Statement attached at **Appendix 2**.

1.5 In the following section, we critique the Council's Assessment of the Stocks Lane site within the Call for Sites process, Updated Green Belt Assessment and Sustainability Appraisal.

## **2. STOCKS LANE SITE ASSESSMENT**

2.1 As noted in section 1, Taylor Wimpey have already submitted a masterplan (**Appendix 1**) and Development Statement (**Appendix 2**) which demonstrates that it is a sustainable and deliverable site which does not meet the tests for including land in the Green Belt. As such, this section summarises the key characteristics of the site and proposed development before critiquing the Council's assessment of the site within the Evidence Base.

2.2 This section should also be read alongside the Transport Note prepared by iTransport and attached at **Appendix 3** which provides a detailed critique of the Council's evidence in respect of highways and accessibility matters, and this is summarised later in this section.

### **The Site and Surroundings**

2.3 The site falls to the west of Penketh, which is a suburb to the west of Warrington. It is outside the existing urban boundary, but sits alongside an existing residential area and forms a natural and logical extension to Penketh and west Warrington.

2.4 The site comprises 30.1 hectares of agricultural pasture land, with equestrian uses on the south east section, and is largely flat in terms of topography. It is broadly rectangular in shape, widening as it extends northwards along the boundary with the Warrington to Liverpool railway line. Penketh Brook runs through the southern part of the site, with the surrounding land (approximately 3 hectares) falling within Flood Zone 3. There are hedgerows and tree planting along the field boundaries, which form robust boundaries around the site and landscape features within the site.

2.5 The site is in a sustainable location on western edge of Penketh, approximately 1km east of the Local Centre on Warrington Road which provides local shops and facilities. The larger Honiton Way Neighbourhood Centre is 1.5km away and the site is located within 600m of the nearest primary school. There are also bus stops on the southern boundary of the site offering regular services to Warrington town centre, Huyton and Liverpool. A greater range of shops and facilities can be found in the nearby Town Centre of Warrington which is 5.5 km to the east.

2.6 The site is bound by the urban area of Penketh to the east with the rear of residential properties fronting Stocks Lane. Brookside Farm lies in the south-east corner. The north of the site is bound by the Warrington to Liverpool Railway line. Along this boundary there are sporadic trees and hedgerows. The A5080, Farnworth Road, runs along the southern boundary of the site, which is lined by residential properties and farm buildings. Open agricultural fields lie to the west, along with a methane extraction facility, approximately 150m west of the northern corner of the site.

2.7 The urban area is characterised by a mix of semi-detached and detached properties, including some single storey dwellings. To the east of the site, Farnworth Road links with a large 5-arm roundabout providing access to the A562 and minor local access roads. There are a wide range of employment sources of local and regional importance within close proximity of the site, including Omega and

Lingley Mere, Inner Warrington and the Town Centre, the Waterfront and Arpley Meadows and Port Warrington.

**Proposed Development**

2.8 The illustrative masterplans show a high quality residential scheme which will deliver the following:

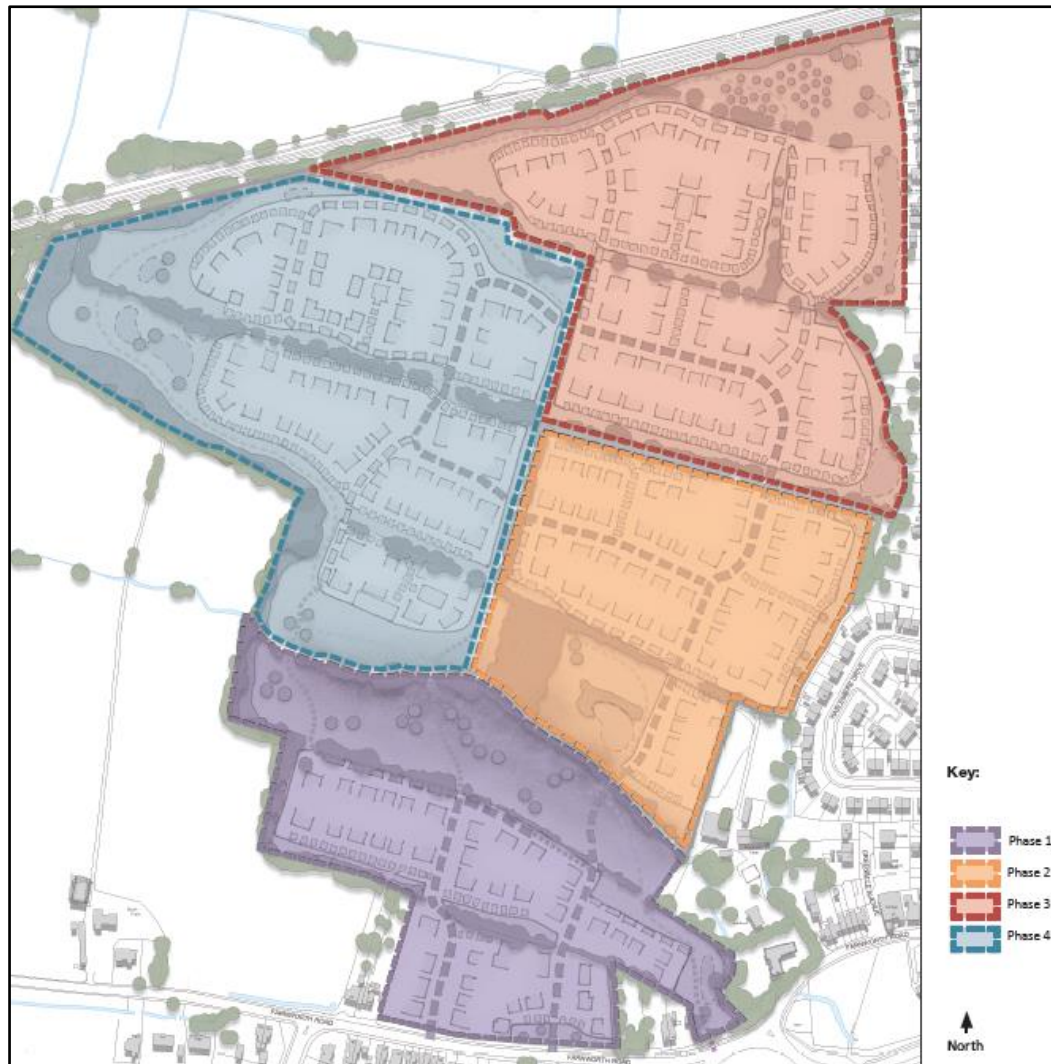
- Up to 600 new family and affordable homes;
- Approximately 12 hectares of accessible, safe and multi-functional greenspace, including a wetland park and orchard area, providing recreational and environmental benefits;
- Extensive new footpaths and cycleways encouraging sustainable transport and informal recreation.

Figure 2.1 – Illustrative Masterplan



2.9 In terms of delivery and phasing, whilst the wider site is clearly a longer term strategic site, which will 15+ years to develop fully; there is an obvious first phase, comprising the land north of Farnworth Road up to Penketh Brook, which could deliver up to 115 units in the first five years.

Figure 2.2 – Phasing Plan



### Call for Sites Assessment

2.10 We begin by critiquing the Council’s Call for Sites pro forma for this site (Ref: R18/138) and make the following comments:

- **Site Area:** Is now confirmed at 30.1 Ha (not 30.8 Ha as submitted in the call for sites or 30.2 as measured by the Council).
- **Flood zones 2 and 3:** Whilst we do not dispute this constraint, it should be noted that over 70% of the site is in Flood Zone 1 (with 11% in Flood Zone 2 and 10% in Flood Zone 3) as confirmed in the Sustainability Appraisal (Criteria NR5), and the illustrative masterplan demonstrates that 600 units can be delivered without developing in these areas.
- **TPO issues:** There are no TPOs within the site, as confirmed in the Sustainability Appraisal (Criteria BG4), so this should say ‘No’.

- Statutory Listed Buildings: Whilst we do not dispute this constraint, it should be noted that the Grade II Listed Brookside Farmhouse is heavily screened by trees and is already flanked by existing residential development, which will minimise any impacts if the site is developed.
- Potentially Contaminated Land: We do not dispute the potential for contamination, and have not yet undertaken intrusive investigations to confirm; however the Sustainability Appraisal (Criteria NR2) confirms that just 0.23% of the site overlaps with contaminated land.
- Green Belt Assessment: We deal with in more detail below.
- Overall Site Comments:
  - Equestrian use covers approximately 20% of the site (6Ha).
  - Reference to TPO should be removed.
  - Flood Zone 2 and 3 only covers 20% of the site.
  - We consider the site to make no more than a moderate contribution in Green Belt terms, and address this in more detail below.
  - Only 0.23% of the site overlaps with contaminated land.

### **Sustainability Appraisal**

2.11 In addition to the above, we provide further detailed comments on the 27 assessment criteria in the Sustainability Appraisal of site R18/138 (AECOM ID 154):

- EC3: Proximity to key employment sites: Whilst Fiddlers Ferry is the only key employment site in walking distance, the site is very well located to access Warrington, Birchwood, Manchester and Liverpool by train (via Sankey for Penketh station) and is also within a short drive of many other opportunities including Lingley Mere, Omega, Gemini; which can be accessed without passing through the town centre and will therefore help to reduce congestion. Therefore we suggest this score is upgraded from light green to dark green.
- HW2: Access to Local Natural Greenspace: Firstly, the ANGST standards referenced here have now been archived, suggesting they are no longer in place. Secondly, the text acknowledges that the site is large enough to accommodate new greenspace, and we can confirm that local natural greenspace is central to the proposals, which include 12 hectares of accessible, multi-functional greenspace, including a wetland park and orchard area, with a comprehensive footpath network linking these together. As such we would suggest this score is upgraded from amber, to light green.
- ACC3: Access to bus services: The nearest bus stops on Farnworth Road provide access to a 30-minute frequency service to Warrington and Liverpool, which we do not consider low frequency in the context of Warrington. In addition, there are further services available

from the A562 500-600m to the south, which provide additional services to Warrington, Widnes and the surrounding local areas. As such we consider the site is relatively well served by buses both in terms of frequency and connectivity, and suggest this score is upgraded from amber, to light green.

- **NR3: Loss of High Quality Agricultural Land:** This notes that the site is 99.97% Grade II agricultural land; however the Magic Map resource suggests it is actually Grade 3a. Furthermore only one field within the site (totalling 4 Ha, or just 13% of the total site) is in active arable use, with the remainder classified as improved grassland, while approximately 20% of the site is used for grazing horses; suggesting that the land is not being fully exploited for agricultural use anyway and therefore its loss will have less impact. On this basis we would suggest this score is upgraded from red to amber.
- **BNH1/2: Impacts on Heritage Assets:** As noted above, the Grade II Listed Brookside Farmhouse is already flanked by existing residential development, and is heavily screened by trees from the open field patterns described in the text, and therefore it is our view that the development of the site will have minimal impact on its setting. On this basis we would suggest this score is upgraded from amber to light green.
- **BNH3: Capacity of landscape to accommodate development:** We address this criteria in detail within the Green Belt Assessment below (in purpose 3), but overall we disagree with the Council’s assessment and suggest the score is upgraded from red to amber.
- **BG3: Impact on Local Wildlife Sites:** Whilst we acknowledge that there is a local woodland area adjacent to the south east corner of the site, there is nothing to suggest that the proposed development will have any negative impacts on this, in fact the proposals show greenspace in this area as part of a green corridor that traverses the site along Penketh Brook, suggesting that this site would be preserved and potentially enhanced. On this basis we would suggest this score is upgraded from amber to light green.

2.12 The Council’s Sustainability Appraisal does not provide total scores for each site, instead it provides a matrix based on the 4 colour scores noted above (Red, Amber, Light Green, Dark Green). We have given each colour a score as per the table below, so these can be added to give a total and allow for a more meaningful and direct comparison of sites.

*Figure 2.3 – Sustainability Appraisal Comparative Scoring*

	Mitigation likely to be required/ unavoidable impacts	1
	Mitigation may be required/ unavoidable impacts	2
	Unlikely to have a major impact on trends	3
	Promotes sustainable growth	4

2.13 As things stand the Stocks Lane site scores 73; however based on our suggestions above we would suggest this is increased to 80.



- 2.14 In terms of comparison, a score of 73 would rank the site joint 35<sup>th</sup> out of the 123 sites considered in the Sustainability Appraisal (which we understand includes those sites put forward for housing in the recent call for sites and previous Green Belt sites submitted to the SHLAA), with the average score being 70.52. It is also pertinent that the sites within the South West Extension generated an average score of 68.66 whilst those in the Garden Suburb generated an average score of 72.06.
- 2.15 So, even based on AECOM’s assessment this omission site ranks above average and higher than several of the sites which have been allocated. If this score was increased to 80 as suggested in our assessment the site would rank joint 4<sup>th</sup> overall, out of 123 sites; which clearly support its inclusion within the Local Plan for housing development.

**Green Belt Assessment (July 2017)**

- 2.16 We welcome the fact that Arup have assessed all the sites put forward during the Call for Sites process, as this provides more clarity on the Green Belt contribution of individual sites, rather than that of the large, arbitrarily defined parcels assessed in advance of the Scope and Contents consultation.
- 2.17 That said we do have several comments and suggested amendments to the assessment of Site R18/138, which is set out below, and these should be read alongside the Green Belt Assessments we provided to the Scope and Contents consultation (Ref: GL/MAN.P16-0574/L002v4) and within Chapter 3 of our Development Statement (**Appendix 2**).

Figure 2.4 Council/ Arup Assessment of Stocks Lane Site- July 2017

GREEN BELT PURPOSE	ARUP GREEN BELT ASSESSMENT- CALL FOR SITES SUBMISSION R18/138
<p><b>Purpose 1: to check the unrestricted sprawl of large built-up areas</b></p>	<p><b>'Strong contribution:</b> The rear of the residential development along Stocks Lane forms the boundary with the built-up area along the eastern edge of the site, which is not durable and could not prevent sprawl into the site in the long term. Farnworth Road (A5080) forms the southern boundary between the site and built-up area which is durable and could prevent sprawl. The site only has a limited connection to the built-up area. Given the shape of the built-up area, development of the site would not round of the settlement pattern. Overall the site makes a strong contribution to checking unrestricted sprawl.'</p>
<p><b>Purpose 2: to prevent neighbouring towns merging into one another</b></p>	<p><b>'Weak contribution:</b> The site forms a less essential gap between the Warrington urban area and Widnes whereby development of the site would slightly reduce the actual gap but not the perceived gap between the towns. The gap is already narrower in other locations. Overall, the site makes a weak contribution to preventing towns from merging.'</p>
<p><b>Purpose 3: to assist in safeguarding the countryside from encroachment</b></p>	<p><b>'Strong contribution:</b> The boundary between the site and the built-up area is the rear gardens of residential development along Stocks Lane to the east and Farnworth Road (A5080) to the south. The long eastern boundary means these are predominately not durable and could not prevent encroachment into the site. The boundaries between the site and the countryside include the railway line to the north and which is durable and field boundaries to the east which are not durable. The non-durable boundaries would not be able to prevent encroachment beyond the site if it were developed. The existing land use is open countryside that is predominately in agricultural use, with a number of houses located on the site to the south east. The site has less than 10% built form and dense vegetation however there are open views and therefore the site supports a strong-moderate degree of openness. Overall the site makes a strong contribution to safeguarding the countryside from encroachment.'</p>

<b>Purpose 4: to preserve the setting and special character of historic towns</b>	<b>'No contribution:</b> <i>Warrington is a historic town however the site is not within 250m of the Warrington Town Centre Conservation Areas. The site does not cross an important viewpoint of the Parish Church.'</i>
<b>Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>	<b>'Moderate contribution:</b> <i>The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.'</i>
<b>Justification for Assessment</b>	<i>'The site makes a strong contribution to three purposes, a moderate contribution to one and no contribution to one. In line with the methodology, the site has been judged to make a strong overall contribution. It supports a strong-moderate degree of openness and there are non-durable boundaries between the site and the settlement which mean that the site has a strong role in preventing encroachment into the Green Belt. In addition, the site makes a strong contribution to checking the unrestricted sprawl of Warrington and from preventing towns from merging.'</i>
<b>Overall Assessment</b>	<b>'STRONG CONTRIBUTION'</b>

2.18 At the outset, there is a clear error in the justification for the assessment which notes a strong contribution to 3 purposes, a moderate contribution to one and no contribution to another; whereas the actual assessment only notes a strong contribution to 2 purposes, with a moderate contribution to one, a weak contribution to one and no contribution to another. This casts serious doubt over the overall robustness of the conclusions reached in relation to this site.

2.19 We now look at each of the five purposes in turn:

***Purpose 1: to check the unrestricted sprawl of large built-up areas***

2.20 We disagree with the Council's Assessment here, as the Warrington to Liverpool Railway Line and Farnworth Road clearly form strong physical boundaries which restrict sprawl to the north and south; and whilst the site is open to the west, the new proposed western boundary is no less durable than the existing boundary to the rear of the properties on Stocks Lane and has opportunities for a stronger landscaped buffer to create a more sympathetic edge to the urban area.

2.21 In addition, existing development at Doe Green to the south already and Lingley Green to the north already extend out westwards making this a logical extension to the Penketh, infilling and rounding off at the edge of the urban area.

2.22 On this basis we consider the Stocks Lane site to make a **moderate** contribution to purpose 1.

***Purpose 2: to prevent neighbouring towns merging into one another***

2.23 We agree with the Council's Assessment here, particularly the acknowledgement that the gap is already narrower in other locations as illustrated on the plan over the page:

Figure 2.4 – Green Belt Analysis: Plan to Demonstrate Prevention of Merging Neighbouring Towns



2.24 As such, we agree that the site makes a **weak** contribution to purpose 2.

***Purpose 3: to assist in safeguarding the countryside from encroachment***

2.25 We disagree with the Council’s Assessment here, as whilst the development of the site will inevitably result in the loss of some open countryside, this is the case for all Green Belt sites. In this instance, the railway line and main road provide strong boundaries preventing encroachment north and south, and also ensure that the site is not a particularly tranquil location or one of intrinsic beauty, which is typically associated with open countryside, a view further reinforced by the fact that the cooling towers of Fiddlers Ferry Power Station are clearly visible to the south. Indeed the Area Profile for West Warrington acknowledges that *“the area is dominated by the dominant landmark of Fiddlers Ferry Power Station”* in its ‘Landscape Character Overview’.

2.26 In addition our landscape and visual analysis has demonstrated that the site has generally limited visibility in the wider landscape due to the relatively flat nature of the land and the existing vegetation within the site, at site boundaries and in the wider landscape; and as such makes a limited contribution to openness.

2.27 The new proposed western boundary also provides opportunities for a robust and defensible landscape buffer to prevent further encroachment, through strengthening the existing field boundaries.

2.28 Finally, the site does not have any public footpaths across it that provide access to the open countryside for those living nearby in the urban area. As such, the site currently serves little

function as accessibly countryside for the benefit/enjoyment of the general public and its loss would not be unacceptable. On this basis we consider the Stocks Lane site to make a **moderate** contribution to purpose 3.

***Purpose 4: to preserve the setting and special character of historic towns***

- 2.29 We agree with the Council’s Assessment here. Whilst Warrington is arguably an historic town, the Green Belt around Warrington was certainly never put in place due to its historic character (unlike Chester, York, Oxford, Morpeth, etc). Even so, the site is over 4km from the Warrington Town Centre Conservation Areas, and the site does not cross an important viewpoint of the Parish Church.
- 2.30 Widnes is also arguably a historic town but again the Green Belt around Widnes was not put in place to preserve its historic character. Again, the site is over 4km from its Conservation Areas.
- 2.31 In terms of other historic considerations, there is a Grade II listed Farm (Brookside Farm) at the south west corner of the site, however this is heavily screened by trees, and is already flanked by existing residential development, which ensures that development of the site will have minimal impact on its setting. Moreover, we maintain that the Green Belt’s function is not to preserve the setting of individual historic buildings. That can be achieved through other planning policy designations and considerations.
- 2.32 As such, it is clear the site makes **no contribution** to purpose 4.

***Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land***

- 2.33 We strongly disagree with the Council’s Assessment here, and reiterate our comments from the previous consultation. In our view the 2.08% brownfield capacity figure is irrelevant. The key issue here is that the Evidence supporting the Preferred Development Options has categorically concluded that there is insufficient urban land to meet housing needs going forward, which includes all suitable brownfield and regeneration land, and that this provides the exceptional circumstances for Green Belt release.
- 2.34 In the Council’s view this will require the release of land for at least 9,345 homes (or 38% of the current Local Plan total), and in our view as much as 12,130 homes (or 44% of the potential total).
- 2.35 Either way, this confirms that no individual Green Belt parcel is making any contribution to urban regeneration. As such the purpose 5 assessment should be changed to **no contribution** throughout, with an explanation in line with that given above.

***Overall Assessment/ Justification***

- 2.36 To conclude, the site makes a moderate contribution to two purposes, a weak contribution to one and no contribution to two. In line with the methodology, the parcel has been judged to make a moderate overall contribution. It makes a modest contribution to openness, has strong physical

boundaries restricting sprawl and encroachment to the north and south, and will round off the urban area, without closing the gap between Penketh and Widnes, whilst it clearly will have no impact on historic towns or regeneration objectives.

- 2.37 The Council must have reached a similar conclusion in the past as they previously identified the land west of Penketh within a larger area of search for potential safeguarding/ release from the Green Belt, in the Warrington Borough Draft Plan from 1993 (see the plan at Figure 6.2 of our main representations).

### **Summary of Transport Matters**

- 2.38 The Transport Note attached at **Appendix 3** reached the following conclusions on the Stocks Lane site and the wider Preferred Development Option:

- *the Stocks Lane site is very well located in terms of its proximity to key services and provides a strong opportunity for trips to be made by sustainable transport modes.*
- *the site can be accessed from its southern boundary onto the A5080 Farnworth Road, via two separate accesses, which would both operate comfortably within their capacity.*
- *A development of this scale will generate c.300 vehicle trips during the weekday peak periods, with much lower levels during off-peak periods and at weekends, which is not considered to have a significant impact upon the operation of the wider network.*
- *the Stocks Lane Penketh site performs very well against the Council’s accessibility criteria as set out within the Interim Sustainability Appraisal and therefore represents a sustainable location for sustainable development, according with both local and national policies.*
- *there are a number of cases where a more detailed review of the accessibility of the Stocks Lane site would have resulted in it achieving a higher ‘score’ against the Council’s criteria.*
- *the Stocks Lane site sits within a wider area referred to as the Western Extension by the Council, which is included in two of the five options that were considered, but has not been chosen.*
- *In transport terms, the options containing the Western Extension perform as well as the development proposals within the PDO.*
- *Development of a Western Extension offers the potential to be supported by existing public transport provision, including rail provision, and existing highway infrastructure. The Western Extension performs strongly in terms of its ability to promote active travel.*
- *The Council has not conducted any detailed assessment of the cumulative traffic impacts of any of the potential development options and therefore it is not appropriate to discount potential development sites which perform well against the strategic objectives of the Local Plan until such an assessment has been concluded.*

### **3. CONCLUSIONS**

- 3.1 We conclude that the Stocks Lane site does not fulfil the 5 purposes for including land in the Green Belt, and combined with the fact that it is a sustainable and deliverable site, as demonstrated in the attached Development Statement and Transport Note, it is recommended that it be released from the Green Belt through the Local Plan process to help meet future housing needs, either as part of a formal 'West Warrington' urban extension or as a standalone site.
- 3.2 The site is also within walking distance of Sankey with Penketh Train Station and would therefore directly support sustainable travel patterns in line with Strategic Objective W4.
- 3.3 This conclusion is compliant with historic assessments of the site which were sufficient to see it identified in a pre-RSS draft plan as safeguarded land, and the pressing nature of the current need for housing land justifies that the parcel be released now rather than safeguarded for longer term.

**APPENDIX 1 - ILLUSTRATIVE MASTERPLAN**

















North

**RANDALL  
THORP**

LANDSCAPE ARCHITECTURE  
ENVIRONMENTAL PLANNING  
MASTERPLANNING  
URBAN DESIGN

Canada House, 3 Chepstow Street,  
Manchester M1 5FW  
0161 228 7721 mail@randallthorp.co.uk  
www.randallthorp.co.uk

**KEY:**

- |  |   |
|--|---|
|  Site boundary                |  Proposed footpaths                            |
|  Existing buildings           |  Pedestrian route and emergency vehicle access |
|  Existing vegetation          |  Proposed primary road                         |
|  Proposed vegetation          |  Proposed secondary road                       |
|  Proposed greenspace          |  Proposed private drive                        |
|  Existing waterbodies         |  Development parcels                           |
|  Proposed waterbodies/wetland |  Proposed mews courtyard                       |

**Taylor  
Wimpey**

**Stocks Lane,  
Penketh**

Illustrative Masterplan



**APPENDIX 2 – STOCKS LANE DEVELOPMENT STATEMENT**

**APPENDIX 3 – TRANSPORT NOTE**

## TECHNICAL NOTE

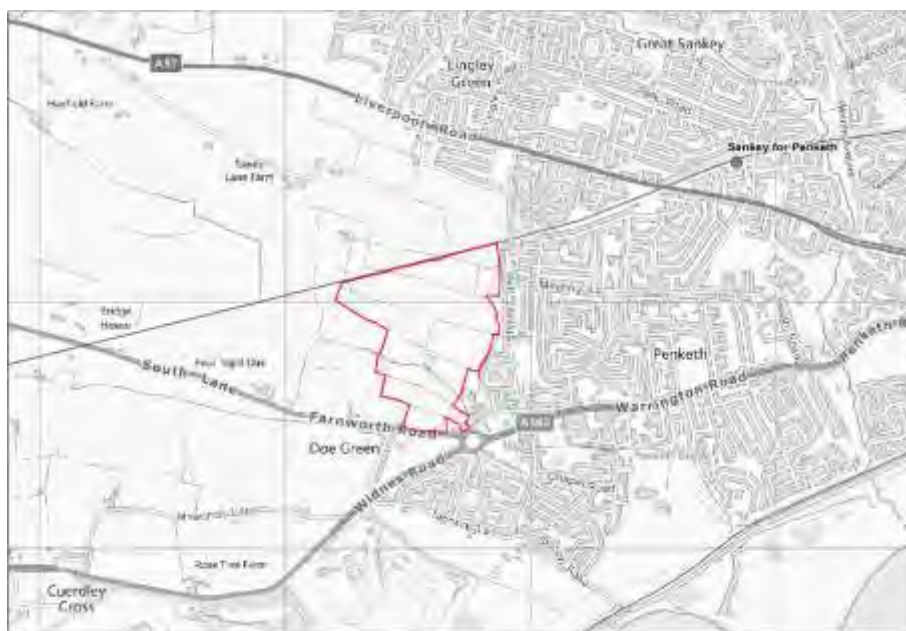
<b>Project No:</b>	<b>ITM12434</b>
<b>Project Title:</b>	<b>Stocks Lane, Penketh</b>
<b>Title:</b>	<b>Response to Warrington Borough Council's Preferred Development Option</b>
<b>Ref:</b>	<b>VACE/ITM12434-003 TN</b>
<b>Date:</b>	<b>20 September 2017</b>

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### SECTION 1 INTRODUCTION

- 1.1.1 i-Transport has been commissioned by Taylor Wimpey to provide transport advice in support of their representations to the Warrington Local Plan 'Preferred Development Option Regulation 18 Consultation'. This work specifically refers to Taylor Wimpey's interests in land west of Stocks Lane, Penketh which they are promoting for residential development.
- 1.1.2 The site is located to the north of the A5080 Farnworth Road, to the west of Penketh, c.5km from Warrington town centre. The site is bounded to the north by the Warrington to Liverpool railway line and to the east by existing dwellings on Stocks Lane, Penketh. The site extends to an area of 30.1 hectares.
- 1.1.3 The site's location is shown below in Figure 1.1.

**Figure 1.1: Site Location Plan**



- 1.1.4 Preliminary appraisal work has been conducted by Taylor Wimpey to identify the potential opportunities and constraints associated with the Stocks Lane site. Initial masterplanning work identifies that the site could be developed for up to 600 dwellings.
- 1.1.5 Taylor Wimpey has made a number of representations to the Council, promoting the site for residential uses and details of the site were submitted to the Council as part of the Council's Call for Sites exercise conducted in Autumn 2016.
- 1.1.6 A Development Statement was submitted to the Council setting out the key benefits of the site and demonstrating the site's suitability for residential development. An appraisal of the site's accessibility, access arrangements and potential off-site impacts are set out in Section 2 of this report.
- 1.1.7 The Council has considered the Stocks Lane site within its appraisal of potential development sites to be taken forward as part of the its Preferred Development Option.
- 1.1.8 This report therefore considers the Council's appraisal of the transport elements of the Stocks Lane, Penketh site and compares this with the more detailed assessment conducted by i-Transport on behalf of Taylor Wimpey.
- 1.1.9 Specific reference has been made to the following reports which form part of Warrington Borough Council's suite of documents that have been published for consultation:
- Preferred Development Option Regulation 18 Consultation (July 2017)
  - Site Proformas for Call for Sites Responses and SHLAA Green Belt Sites (July 2017)
  - Warrington Local Plan Review – Sustainability Appraisal: Interim SA Report (July 2017)
  - Area Profiles and Options Assessment Technical Note (July 2017)
- 1.1.10 This technical note sits alongside the wider representation report prepared by Pegasus Group on behalf of Taylor Wimpey.

## **SECTION 2 APPRAISAL OF THE PROPOSED STOCKS LANE DEVELOPMENT SITE**

### **2.1 Introduction**

2.1.1 This section presents an appraisal of the transport characteristics of the proposed development site at Stocks Lane, Penketh against the transport policies set out within the National Planning Policy Framework (NPPF). The three main aspects of this appraisal therefore consider:

- the accessibility of the site by sustainable modes;
- the proposed access arrangements; and
- a preliminary assessment of the scale of impact of the development-generated traffic upon the surrounding highway network.

### **2.2 Accessibility Appraisal**

2.2.1 Preliminary transport appraisal work has demonstrated that the Stocks Lane site is very well located in terms of its accessibility to a wide range of facilities on foot, by cycle and by public transport.

2.2.2 Good quality footways are provided along the site frontage and onwards to Penketh along the A562 Widnes Road and Stocks Lane, offering access to local bus services and key facilities in Penketh.

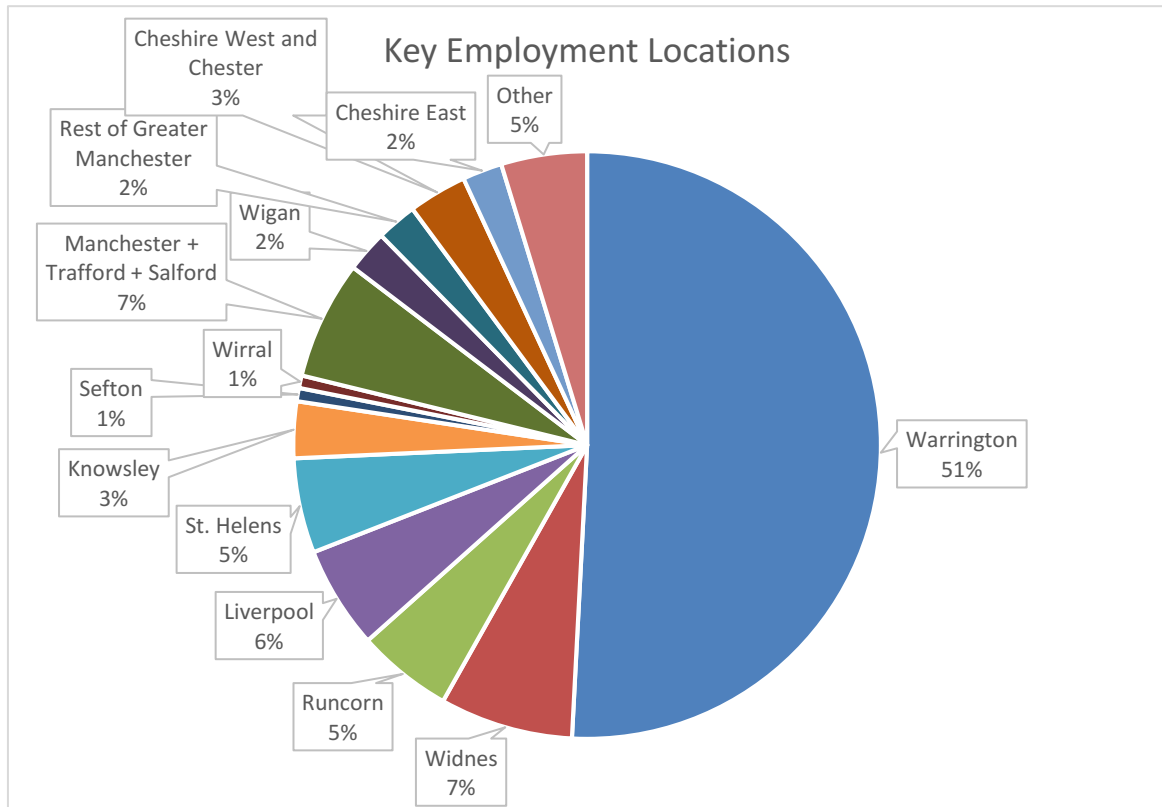
2.2.3 The cycling route into Warrington town centre from the site is via the A562 and Liverpool Road. The route is assigned a Grade 3 rating by the Council which indicates it is a 'medium difficulty' route, and is therefore considered suitable for confident cyclists.

2.2.4 In addition, a surfaced cycle path is provided along the St Helens Canal to the south of the providing an alternative, largely traffic-free route to Warrington town centre. The roads within Penketh are classed as 'low difficulty' in terms of their cycleability making them attractive to access the key facilities in this area, including schools, shops and community facilities.

- 2.2.5 There are existing bus services that run along the A5080 Farnworth Road and the A562 Widnes Road to the south of the site. There are bus stops adjacent to the site on Farnworth Road and the stops on Widnes Road are c.400 metres from the site access – approximately a five-minute walk from the entrance to the site.
- 2.2.6 These stops are served by bus routes 7, 32A/32E and 110 which provide links to local facilities within Penketh in addition to connections to Warrington, Widnes, Liverpool and Knowsley. The three principal services offer a combined six services per hour during the daytime. Figure A1 in Appendix A shows the existing bus routes within the vicinity of the site.
- 2.2.7 Sankey for Penketh railway station is located c.2km north-east of the site, offering frequent connections to Warrington town centre, Birchwood, Manchester, Liverpool, Widnes and Liverpool South Parkway (for Liverpool Airport).
- 2.2.8 The site is well served by a wide range of facilities, including schools, shops, health, employment and leisure opportunities. Figure A2 attached at Appendix A illustrates the locations of key facilities within the vicinity of the Stocks Lane site and the distance of the nearest facilities to the site are presented in the table enclosed in Appendix A.
- 2.2.9 The nearest schools to the site include Penketh Community Primary School, Penketh South Primary school and Penketh High School. The primary schools are within 10-20 minutes' walk of the site, whereas the High School is within a 25-minute walk, a 6-7 minute cycle ride and is accessible via one of the bus routes which stops close to the site.
- 2.2.10 There are local shopping and health facilities within acceptable walking distances from the site including two convenience stores on Warrington Road.
- 2.2.11 Penketh District Centre includes a post office and health and community facilities including a health centre, pharmacy, library, community centre and swimming pool. These facilities can be accessed via walking, cycling or via local bus services.
- 2.2.12 Additional retail and leisure facilities available within the town centre are accessible from the direct bus services adjacent to the site and both Manchester and Liverpool city centres are accessible by rail from Sankey for Penketh station.

2.2.13 The site is very well located in terms of its access to employment facilities, with opportunities for key employment locations to be accessed by sustainable transport modes. The following chart summarises the 2011 Census journey to work data for the Penketh area (MSOA Warrington 019), setting out the key employment destinations based upon current car drivers within Penketh.

**Figure 2.1: 2011 Census Journey to Work Data for Penketh**



2.2.14 The above chart demonstrates that approximately half of the work trips are to local destinations within Warrington. A significant proportion of the trips are to destinations in nearby Halton (Widnes and Runcorn), Liverpool and in Greater Manchester, most notably in Manchester, Trafford, Salford and Wigan.

2.2.15 Figure A3 contained within Appendix A identifies the key employment destinations within Warrington and demonstrates that many of these locations will be accessible by bus or rail services close to the site.

2.2.16 The location of the site to the west of Warrington offers great potential for residents to access the employment opportunities at Omega and Lingley Mere without using the town centre’s busy road network and the site has good links to the Strategic Road Network via Junction 8 of the M62 to the north of the site.

2.2.17 More distant employment opportunities within Halton and Liverpool are accessible by the bus services which stop adjacent to the site, and Liverpool, Manchester, Salford and Trafford are accessible by rail via the services at Sankey for Penketh station.

2.2.18 Overall, it is concluded that the site is very well located in terms of its proximity to key services and provides a strong opportunity for trips to be made by sustainable transport modes.

2.2.19 The accessibility of the site will be further enhanced by the development of a Travel Plan as part of a wider transport strategy for the site. The Travel Plan will include a series of physical and other measures designed to encourage sustainable travel patterns amongst the future residential community.

### 2.3 **Site Access Arrangements**

2.3.1 i-Transport's transport appraisal has also identified the potential for the site to be accessed from its southern boundary onto the A5080 Farnworth Road, via two separate accesses.

2.3.2 The two accesses would take the form of T-junctions, deliverable within the site frontage. Drawing ITM12434-GA-003 Rev A contained within Appendix B illustrates the potential access arrangements onto the A5080 Farnworth Road.

2.3.3 Within the site, the internal road network will include a series of loops and connections between the two access points, helping to spread traffic loads within the site. Two dedicated emergency vehicle accesses will also be provided within the development.

2.3.4 The indicative masterplan also provides for networks of footpaths and pedestrian / cycle routes across the site, encouraging the use of sustainable modes.

### 2.4 **Development Impacts**

2.4.1 A development of this scale will generate c.300 vehicle trips during the weekday peak periods, with much lower levels during off-peak periods and at weekends. These trips will include a variety of journey purposes, including commuting trips, trips to schools, shops, leisure and other destinations locally and further afield.



- 2.4.2 As such the development traffic will spread across a number of routes around the site including Farnworth Road, Widnes Road, Warrington Road and Stocks Lane and beyond. The majority of traffic will travel eastwards from the site towards the A562 / A5080 roundabout from where it will dissipate across a number of routes. A modest level of traffic will travel westwards from the site towards Halton.
- 2.4.3 Capacity assessments have been conducted which show that the two proposed site accesses onto Farnworth Road would have sufficient capacity to accommodate the additional development traffic.
- 2.4.4 These assessments assume that the majority of traffic would use the principal eastern access to the site and take account of the proposed right turn lanes that would be provided on Farnworth Road, allowing traffic turning into the site from the east to shelter within the dedicated lane, without impeding through-traffic movements along Farnworth Road.
- 2.4.5 A preliminary assessment of the impact of the additional development traffic upon the A5080 / A562 roundabout to the south-east of the site has also been undertaken. This shows that the forecast c.250 additional trips that would pass through the roundabout during the peak hours could be accommodated by the existing roundabout, and the roundabout would operate comfortably within its capacity, even allowing for background traffic growth.
- 2.4.6 Beyond the roundabout, the development traffic will spread across a range of routes and the scale of additional traffic is not considered to have a significant impact upon the operation of the wider network.

## 2.5 **Summary**

- 2.5.1 The above appraisal concludes that the proposed development site offers a sustainable location for residential development, that safe access can be achieved for all people and that the residual impacts of the development would not be severe.
- 2.5.2 The development therefore accords with paragraph 32 of the National Planning Policy Framework (NPPF).

2.5.3 The proposals also accord with local policy guidance including Warrington's Core Strategy. Policy CS1 Overall Spatial Strategy – Delivering Sustainable Development' and Policy CS4 Transport of the Core Strategy state:

**“the need to develop sites, services and facilities in appropriate locations accessible by public transport, walking and cycling” (CS1)**

**“... development will be located to reduce the need to travel, especially by car, and to enable people as far as possible to meet their needs locally.” (CS4)**

2.5.4 It has therefore been demonstrated that the proposed residential development at Stocks Lane would be accessible by public transport, walking and cycling thus reducing the need to travel by car and that there are a range of facilities available locally to the site.

## **SECTION 3 THE COUNCIL'S APPRAISAL OF THE STOCKS LANE, PENKETH SITE**

### **3.1 Introduction**

3.1.1 The Council has prepared a suite of documents which outline the process by which it has developed the Local Plan Evidence Base and the resultant Preferred Development Option.

3.1.2 This section considers the assessment conducted by the Council of the potential development site at Stocks Lane, Penketh. Further details of the Council's wider review of development needs and spatial options are considered in Section 4 of this report.

3.1.3 This section considers the Council's appraisal of the Stocks Lane site in response to the Call for Sites submission and a more detailed appraisal of the site conducted as part of the Council's Interim Sustainability Appraisal.

### **3.2 Call for Sites Proformas - West**

3.2.1 As outlined in the Introduction, the Council issued a 'Call for Sites' in late 2016, inviting developers and landowners to provide details of potential development sites to be considered as part of the Council's wider appraisal of the Local Plan requirements and options.

3.2.2 Taylor Wimpey submitted details of the proposed site at Stocks Lane, Penketh in response to the Call for Sites.

3.2.3 The Council has conducted an initial assessment of all sites submitted as part of their Call for Sites process.

3.2.4 The Council's initial assessment is published in a series of six reports, five of which relate to geographical areas and the sixth relates to gypsy and traveller sites. The site at Stocks Lane, Penketh is included within the Site Proformas – West document and is referenced as Site R18/138.

3.2.5 The Council notes the preferred use for the site is Housing and states that the initial masterplanning work undertaken by Taylor Wimpey identifies that the site could deliver up to 600 dwellings.

3.2.6 Under the title 'Constraints', the Council notes the following with regard to the Stocks Lane site:

- Strategic Road Network Access: Farnworth Road
- Local Highway Access: Farnworth Road
- Access comments: Access to Farnworth Road on southern boundary
- Public Rights of Way: No

3.2.7 The Council's appraisal of the opportunities to take access to the site from Farnworth Road to the south of the site accords with i-Transport's appraisal.

3.2.8 The Council offers no specific comments relating to highways and transport matters within their more detailed site comments.

### 3.3 **Sustainability Appraisal: Interim SA Report**

3.3.1 The Council's Interim SA report presents an appraisal of the sites submitted as part of the Call for Sites process, against an Appraisal Framework, which sets out a range of assessment criteria which are based upon the Council's strategic themes and objectives.

3.3.2 The document identifies the objectives and criteria used to appraise each of the potential development sites and grades each criteria using one of four potential appraisal 'scores' as follows:

- Dark Green – Significant positive effects possible / likely
- Light Green – Positive effects possible / likely
- Amber – Negative effects possible / likely
- Red – Significant negative effects possible / likely

3.3.3 With regard to Accessibility, the Framework identifies two objectives: 'Reduce the need to travel, especially by car, improve choice and the use of more sustainable modes' and 'Protect and enhance accessibility for all the essential services and facilities'; and eight sub-criteria used to determine the relative accessibility of each site.

3.3.4 The Council has appraised the Accessibility of the sites against eight sub-criteria, as follows:

- Will new housing and employment be close to public transport links, or be capable of supporting / delivering new services?
- Will new housing development be within walking distance of essential services such as schools and health facilities?
- Do these essential services have capacity? Are buildings fit for purpose and able to accommodate increased population?
- Will the new development support or facilitate the integration of a range of services in a single location (neighbourhood hub) to increase accessibility and reduce the need to travel.
- Will new housing and employment be in areas that are likely to encourage car usage?
- Will new development increase congestion on key routes?
- Is the infrastructure in place/planned to minimise impact of increased population on traffic issues?
- Will the future use of footpaths and cycleways be maximised by ensuring connectivity and useability?

3.3.5 The Council's detailed appraisal of the Stocks Lane, Penketh site (reference 18/138) is considered below.

- 3.3.6 The Council has assigned a 'light green' score to the site in terms of its accessibility to the nearest primary school on foot (ACC1), the accessibility of the nearest secondary school (ACC2) and the accessibility of the nearest railway station (ACC4). These all indicate that positive effects are likely.
- 3.3.7 The site is assigned a 'dark green' score for its accessibility to a GP service / health centre (ACC5) indicating significant positive effects are likely.
- 3.3.8 The only criteria to which the Council assigns a negative score to the site in accessibility terms is the accessibility of the site to bus services (ACC3). Against this criteria, the Council has assigned an 'amber' score which suggests that negative effects are likely.
- 3.3.9 The Council's assessment states that the site is 263m from a bus stop with a low frequency service. The accompanying notes within the Sustainability Appraisal state that a low frequency of service is considered to be a stop which is serviced less than three times in one hour.
- 3.3.10 However, as set out in Section 2 above, there are existing bus stops along the site frontage which are served by bus routes with a 30-minute frequency. In addition to these, there are additional bus routes which stop on the A562 close to the site which offer a further four buses per hour – these latter services appear to have been missed in the Council's appraisal of the site.
- 3.3.11 The Council's assessment criteria do not reflect the fact that a combination of bus stops can combine to provide a higher level of service. Within the context of the Stocks Lane site, it is this combination of services – i.e. six bus services per hour within a 200 – 400 metre walk of the site access, offering connections to Penketh, Warrington, Sankey Bridges, Liverpool and Knowsley which it is considered provides a very good level of accessibility by public transport.
- 3.3.12 As such it is considered that the Council's assessment score should be amended from 'amber' to 'light green'.
- 3.3.13 The Council's assessment also considers three additional criteria which relate to the accessibility of the site, including the following.

- i) The site's proximity to the principal road network (EC2), scoring this aspect as 'dark green'. This score is considered appropriate and reflective of the site's strong connections to the principal road network.
- ii) The site's proximity to key employment sites (EC3) which it assigns a 'light green' score. Within the description of the rationale and assumptions relating to this criteria, the Council acknowledges the importance of the ability of employment facilities to be accessible to those without access to a car.

As set out in Section 2 above, the Stocks Lane site is very well connected to a range of employment sites and therefore it is considered that distance should not be the only determining factor in appraising the site's access to employment opportunities, but that consideration should also be given to the potential to access such facilities by sustainable modes, including public transport.

As such it is considered that the score for EC3 could be increased to a 'dark green' score highlighting the site's excellent opportunities for access to employment facilities by public transport.

- iii) The site's access to community facilities (HW1) which it assigns a 'dark green' score. This score is considered to be appropriate.

3.3.14 Overall, it is concluded that the Stocks Lane Penketh site performs very well against the Council's accessibility criteria and therefore represents a sustainable location for sustainable development, according with both local and national policies.

3.3.15 The following section considers how the Council has established its Preferred Development Option.

## **SECTION 4 LOCAL PLAN – PREFERRED DEVELOPMENT OPTION REGULATION 18 CONSULTATION**

### **4.1 Introduction**

4.1.1 The Council’s document outlines a four-stage process by which it undertook the necessary evaluation and appraisal work from which it determined its Preferred Development Option (PDO). The four stages of the process are identified as follows:

- Stage 1 – Development Needs and Associated Land Requirements
- Stage 2 – Strategic Objectives for the Local Plan
- Stage 3 – Assess High Level Spatial Options to Accommodate Development
- Stage 4 – Assess Options for Main Development Locations

### **4.2 The Council’s Preferred Development Option**

#### Stage 1

4.2.1 The first stage of the Council’s process included an identification of the Development Needs, the opportunity to maximise urban capacity and therefore the total land requirements for new homes and other land uses. This stage of the process did not include any detailed appraisal of the transport requirements of these land uses and therefore no consideration has been given of this section of the Council’s report.

#### Stage 2

4.2.2 Under Stage 2, the Council notes that the starting point for the Strategic Objectives was to reflect upon the objectives from the existing Plan and from these six Strategic Local Plan objectives were determined. These include the following:

**“ W1 To enable the transition of Warrington from a New Town to a New City through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods ...**

**W2 To facilitate the sensitive release of Green Belt land to meet Warrington’s long term housing and employment needs, whilst ensuring the revised Green Belt boundaries maintain the permanence of Warrington’s Green Belt in the long term ...**



**W4 To provide new infrastructure to support Warrington's growth, reduce congestion and promote sustainable transport options, whilst reducing the need to travel and encouraging active lifestyles ...**

**W6 To minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington's air quality."**

4.2.3 The Council also notes that it then developed a set of assessment criteria from these Strategic Objectives, "**which allow for a more detailed assessment, particularly of infrastructure impacts.**

4.2.4 With regard to W4, four transport-related assessment criteria are identified:

- Local Road Network
- Strategic Road Network
- Public Transport
- Active Travel

4.2.5 These objectives and criteria have been used in the Council's subsequent appraisal of the high level spatial options and the more detailed options for main development locations across the Borough.

### Stage 3

4.2.6 Stage 3 of the Council's process included a high level assessment of the spatial options. Within the flow chart presented at page 12 of the Council's Preferred Development Option report, it is noted that Stage 13 included the following steps to determine the overall high level spatial option:

- Prepare area profiles and growth scenarios;
- Define high level spatial options; and
- Confirmation of preferred growth level and preferred high level spatial option.

4.2.7 The chart also notes that the evidence base used to inform the process included infrastructure capacity and forecast data and a transport review.

- 4.2.8 Initially the Council prepared Area Profiles for the respective areas of the Warrington urban area and for outlying settlements. The main urban area was broken down into five constituent parts and the Stocks Lane, Penketh site lies within the 'West' Area Profile.
- 4.2.9 The assessment also notes that for the main urban area of Warrington, larger urban extensions have been considered given the much larger scale of the main urban area.
- 4.2.10 The Council notes that the other infrastructure to be provided within these extensions will be **"dependent on the scale of the extension, the provision of existing infrastructure and the forecast capacity of that infrastructure"**.
- 4.2.11 The Council also identified three high level spatial options as part of the process, as follows:
- Option 1 – Green Belt release only in proximity to the main Warrington urban area;
  - Option 2 – Majority of Green Belt release adjacent to main urban area with incremental growth in outlying settlements; and
  - Option 3 – Settlement extension in one of more settlement with remainder of growth adjacent to the main urban area.
- 4.2.12 It is noted that all of potential spatial options include development adjacent to the main urban area and therefore development at Stocks Lane, Penketh would accord with all of the high level spatial options considered.
- 4.2.13 The Council notes that these spatial options were tested against the Local Plan Objectives assessment criteria (identified above), which for transport includes assessment of the Local Road Network, Strategic Road Network, Public Transport and Active Travel.
- 4.2.14 The 'Area Profiles and Options Assessment Technical Note' presents the Council's assessment of the three spatial options against the Local Plan objectives and criteria (within Appendix 1 of the document).

- 4.2.15 With regard to 'Local Road Network' and 'Strategic Road Network', reference is made to the need for significant upgrades to local highways and motorway junctions, new distributor roads within Warrington, additional vehicular crossings over the Manchester Ship Canal and River Mersey etc.
- 4.2.16 From initial discussions with the Council, it is clear that this appraisal was not based upon any detailed appraisal of the capacity of the existing transport network, or forecasts of the traffic generation, distribution and assignment of future developments.
- 4.2.17 Notwithstanding this, the development site at Stocks Lane, Penketh lies to the north of the Ship Canal and the River Mersey and offers good access to the town centre and a range of employment sites by bus and rail and via the existing road network.
- 4.2.18 Furthermore, the Council notes in its appraisal, relating specifically to the benefits of a dispersed growth pattern, that:

**“Spreading the potential development sites around Warrington could serve to reduce the case for the essential highway infrastructure necessary to accommodate the growth in travel demand.”**

- 4.2.19 As outlined in Section 2, the location of the Stocks Lane site at the western edge of the town offers the potential for traffic to be spread across a number of routes east, west and north, thus reducing the impact on any one corridor. The proximity of the site to a wide range of facilities also enables trips to be captured locally, where there is greater potential for sustainable and active travel modes to be used, again reducing wider traffic impacts.
- 4.2.20 The Council's appraisal of the options against 'Public Transport' notes:

**“Focussing development within and adjacent to the main Warrington urban area allows bus operators to expand their existing bus network across the town to meet new markets. ...**

**This spatial option would also favour rail users as the main inter-regional rail stations are located within the urban core.”**

- 4.2.21 It is therefore concluded that that development sites which offer the opportunity to make use of existing or expanded bus networks and those with good access to railway stations are considered preferable by the Council, within their assessment. The Stocks Lane site performs strongly in terms of its public transport accessibility.

- 4.2.22 In terms of 'Active Travel', again the Council emphasises the importance of focusing development adjacent to the main urban area, to ensure active travel is viable. The Council also notes that any development needs to ensure that the design and layout promote walking and cycling and do not compromise active travel opportunities.
- 4.2.23 The illustrative masterplan prepared for the Stocks Lane site includes a wide range of pedestrian and cycle routes across the site. The accessibility appraisal presented earlier in this report highlighted a range of facilities within close proximity to the site which would be accessible on foot or by cycle.
- 4.2.24 Overall, it is therefore concluded that development at Stocks Lane, Penketh accords with the high level spatial options identified by the Council and performs well against the accessibility sub-criteria upon which the options were appraised.
- 4.2.25 The output from this stage of the Council's appraisal was that Option 2 was identified as its preferred option, thereby directing more development towards the main Warrington urban area. The Stocks Lane site is therefore consistent with the preferred spatial option and offers significant opportunity to provide a sustainable residential development, well integrated with existing communities and making best use of existing facilities.

#### Stage 4

- 4.2.26 Following on from the high level consideration of spatial options, Stage 4 of the process defines five potential options for the main development locations and again appraises these against the Local Plan objectives and sub-criteria.
- 4.2.27 Two of these potential options include the potential for development to the west of Warrington including on the Stocks Lane, Penketh site. These are:
- Option 3 – a garden city suburb of c.6,000 homes and an urban extension to the west of Warrington of approximately 2,500 homes; and
  - Option 4 – a garden city suburb of c.4,000 homes and an urban extension to the south west of Warrington of up to 2,000 homes and urban extension to the west of Warrington of up to 2,500 homes.).

- 4.2.28 In both of these options, development of the Stocks Lane site has only been considered as part of a wider development of up to 2,500 homes to the west of Warrington and therefore has been considered alongside other potential sites. The 'Western Extension' as it is referred to by the Council therefore includes the Stocks Lane site, the site immediately to the north of Taylor Wimpey's site on the northern side of the railway and extending up to the A57, and land to the south of Penketh, straddling Station Road.
- 4.2.29 The conclusion of the Council's assessment is that Option 2: A Garden City Suburb of c.6,000 homes and an urban extension to the south west of Warrington of c.2,000 homes, is their Preferred Development Option (PDO).
- 4.2.30 The Stocks Lane site does not form part of the PDO and therefore the following considers the Council's assessment of the two options which included development to the west of Warrington (Options 3 and 4) and compares these against the Council's appraisal of the resultant PDO.
- 4.2.31 The Council's appraisal of the options is set out in the Area Profiles and Options Assessment Technical Note and a summary is presented in the Preferred Development Option Regulation 18 Consultation document.
- 4.2.32 Discussions with the Council have confirmed that no detailed traffic assessment or strategic traffic modelling work was undertaken as part of this Stage 4 process, to determine the infrastructure requirements for each option.
- 4.2.33 The Council's Stage 4 assessment notes the following with regard to transport-related criteria:

i) *CONTRIBUTION TO NEW CITY CONCEPT:*

The Council states that the fact that the Western Extension is split over two areas and as such the ability to deliver the associated strategic and local infrastructure needed to support the development is more uncertain.

However, as no detailed assessment of infrastructure requirements has been undertaken, it cannot be determined what infrastructure would be needed to support the Western Extension and thus whether one or more sites have the ability to bring such infrastructure forward.

In addition to this, by spreading development across a number of sites, this also has the benefit of spreading traffic loads across multiple routes, therefore potentially minimising the need for improvements along individual corridors. Development across a number of sites also offers the potential for multiple development outlets to be progressed in tandem, delivering early housing supply and also generating infrastructure contributions at an earlier stage.

ii) *LOCAL ROAD NETWORK:*

The Council notes that the Garden City element of Option 3 is the same as those in the PDO and therefore offers no further comment on this aspect.

However, with regard to the western sites the Council again notes again that these are geographically separated and therefore **“it would be necessary to understand the cumulative impacts of these sites on the adjoining network. Improvements to existing junctions as well as new sections of highway infrastructure may be required for the scale of development proposed.”**

As above, the Council has presented no detailed assessment of the cumulative impacts of any of the potential development options and therefore it is not possible to determine whether junction improvements or new highway infrastructure is required until such an assessment has been conducted.

The initial assessment of the impacts of the Stocks Lane development presented in Section 2 identified that the forecast traffic levels associated with the development could be accommodated within the adjacent network and satisfactory access could be delivered to the site. As the remainder of the Western Extension would add traffic to the A57 corridor to the north and the A562 corridor to the south, with additional connections to local routes, the traffic generated by development on these sites will be spread across the wider network, making good use of existing infrastructure. These comments apply equally to the Western Extension aspects of both Options 3 and 4.

With regard to the PDO, the Council acknowledges that further detailed assessment will be required to determine the impacts of the proposals.

iii) *STRATEGIC ROAD NETWORK*

The Council's assessment notes that **"significant upgrades will be required to the motorway junctions serving south Warrington to support this level of growth"** – this is identified for both Options 3 and 4 as well as for the PDO.

However, the Council's assessment also notes that **"The western extension may marginally offset the impact on the M6 / M56 relative to options 1 and 2 given its geographic distance, but it may increase pressure on Junction 8 of the M62 which has not been designed to accommodate this level of growth."**

The Council therefore acknowledges the benefits of development to the west of Warrington, in terms of reduced impacts on areas of the Strategic Road Network (SRN) in contrast to .

In terms of impacts at M62 Junction 8, many of the trips using the SRN would be associated with commuting trips and as outlined above, over 60% of the likely commuting trips would be to destinations within Warrington or to adjacent Halton, the majority of which would not use the motorway, and trips to other employment destinations further afield can be accessed by rail or bus services close to the site.

iv) *PUBLIC TRANSPORT:*

The Council acknowledges that developments adjacent to the urban area favours public transport use, highlighting these benefits for the PDO (Option2) as well as for Options 3 and 4. However, the Council goes on to state that it may be difficult to secure improvements to public transport routes through development sites which are split in the west area.

It has already been demonstrated that the Stocks Lane site has good access to existing public transport services and there would not be a need to extend services into the site to achieve. Whilst a detailed appraisal of the accessibility of the remainder of the western extension hasn't been conducted, these sites would be able to access existing services on the A562 (common to those serving the Stocks Lane site) and additional services running through Great Sankey and Penketh to the north. The opportunities to spread patronage across a number of existing routes is beneficial in terms of the viability of bus services in the early

phases of development and assists in generating patronage for existing services. It is therefore not accepted that the split of development across multiple sites within the Western Extension would have a detrimental impact upon public transport provision.

v) *ACTIVE TRAVEL:*

The assessment of active travel requirements for the PDO and for Options 3 and 4 notes that active travel would be a viable option and highlighting the importance of ensuring walking and cycling are promoted within developments.

There is therefore no distinction between the two development options containing the Stocks Lane site and the PDO in terms of their ability to deliver a strong contribution towards the promotion of active travel.

4.2.34 Overall, it is concluded that in transport terms:

- Options 3 and 4 which include a Western Extension perform as well as the development proposals within the PDO.
- Development of a Western Extension offers the potential to be supported by existing bus services and existing highway infrastructure which will assist in early delivery of housing on the sites. The Western Extension offers additional benefits in terms of its proximity to existing rail services at Sankey for Penketh railway station, delivering high quality connections to a range of employment and other destinations.
- The Western Extension performs strongly in terms of its ability to promote public transport and active travel.
- The Council has not conducted any detailed assessment of the cumulative traffic impacts of any of the potential development options and therefore it is not appropriate to discount potential development sites which perform well against the strategic objectives of the Local Plan until such an assessment has been concluded.



- In the absence of a detailed appraisal, it cannot conclude that development across a number of sites to the west of the existing built-up area presents any constraints in terms of infrastructure requirements or indeed the ability to deliver any such infrastructure requirements.

## SECTION 5 SUMMARY

- 5.1.1 This technical note responds to the Warrington Borough Council's Local Plan 'Preferred Development Option Regulation 18 Consultation', and specifically refers to Taylor Wimpey's interests in land west of Stocks Lane, Penketh which they are promoting for residential development with an indicative quanta of up to 600 dwellings.
- 5.1.2 It has been demonstrated that the Stocks Lane site is very well located in terms of its proximity to key services and provides a strong opportunity for trips to be made by sustainable transport modes.
- 5.1.3 The appraisal has also identified the potential for the site to be accessed from its southern boundary onto the A5080 Farnworth Road, via two separate accesses, which would both operate comfortably within their capacity.
- 5.1.4 A development of this scale will generate c.300 vehicle trips during the weekday peak periods, with much lower levels during off-peak periods and at weekends.
- 5.1.5 A preliminary assessment of the impact of the additional development traffic upon the adjacent network has concluded that this scale of additional traffic is not considered to have a significant impact upon the operation of the wider network.
- 5.1.6 It is concluded that development at Stocks Lane, Penketh therefore accords with paragraph 32 of the National Planning Policy Framework (NPPF).
- 5.1.7 A review of the Council's assessment work undertaken to support the PDO consultation has also been undertaken.
- 5.1.8 This has shown that the Stocks Lane Penketh site performs very well against the Council's accessibility criteria as set out within the Interim Sustainability Appraisal and therefore represents a sustainable location for sustainable development, according with both local and national policies.
- 5.1.9 A number of specific points have been noted where a more detailed review of the accessibility of the Stocks Lane site would have resulted in it achieving a higher 'score' against the Council's criteria, based upon the specific sub-criteria set out in the Council's appraisal.

5.1.10 A review of the four stage assessment conducted by the Council to determine its PDO has concluded that:

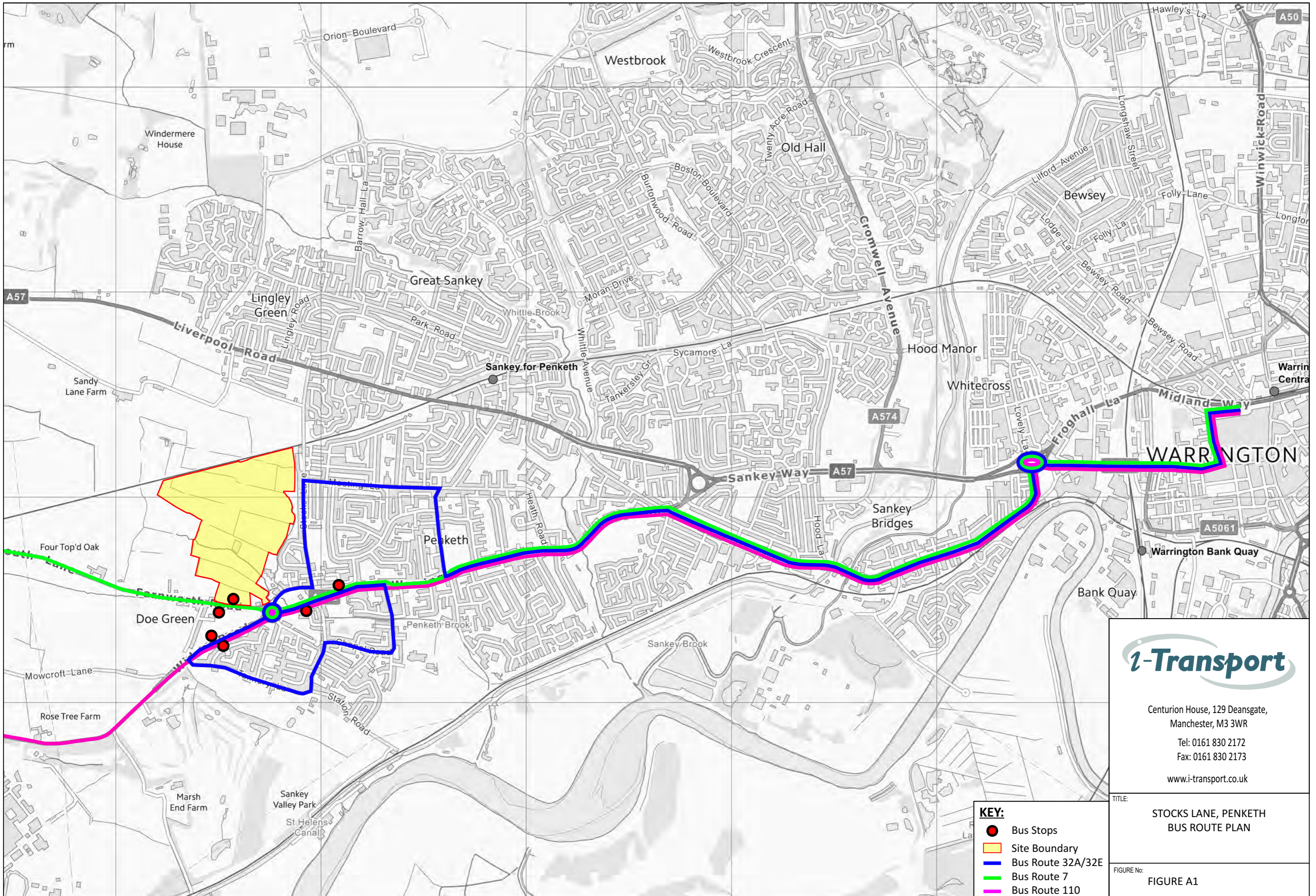
- The Stocks Lane site sits within a wider area referred to as the Western Extension by the Council. The Western Extension is included in two of the five options considered by the Council for the main development options for the Borough.
- The Western Extension does not form part of the Council's resultant Preferred Development Option.
- However, in transport terms, the options containing the Western Extension perform as well as the development proposals within the PDO.
- Development of a Western Extension offers the potential to be supported by existing public transport provision, including rail provision, and existing highway infrastructure. The Western Extension performs strongly in terms of its ability to promote active travel.
- The Council has not conducted any detailed assessment of the cumulative traffic impacts of any of the potential development options and therefore it is not appropriate to discount potential development sites which perform well against the strategic objectives of the Local Plan until such an assessment has been concluded.

**APPENDIX A**

**STOCKS LANE  
ACCESSIBILITY APPRAISAL**

**Table A1 – Key Facilities and Distances to Site Access**

Type of Facility	Land Use	Name	Location	Distance from Site Access
Retail	Foodstore	Sainsbury's	Great Sankey	3.3km
	Convenience	Co-op Food	Penketh	700m
		Spar	Penketh	1.4km
	General Retail	Warrington Town Centre	Warrington	5.1km
Education	Primary School	Penketh Community Primary School	Penketh	800m
		Penketh South Primary School	Penketh	950m
		Park Road Primary School	Great Sankey	2.0km
	Secondary School	Penketh High School	Penketh	1.8km
		Great Sankey High School	Great Sankey	2.5km
Health	Pharmacy	Lloyds Pharmacy	Penketh	1.1km
	GP	Penketh Health Centre	Penketh	1.1km
	Dentist	Mydentist	Penketh	700m
Employment	Business Park	Penketh Business Park	Penketh	2.5km
		Lingley Mere Business Park	Great Sankey	2.8km
	General Employment	Fiddler's Ferry Power Station	Widnes Rd	1.5km
		Warrington Town Centre	Warrington	5.1km
Leisure	Sport Facility	True Fit Golf Centre	Widnes Rd	900m
		Ramp1 Indoor Skatepark	Penketh	2.6km
	Community Facility	Penketh Library	Penketh	1.1km
	Leisure/Fitness Centre	Penketh Swimming Pool and Community Centre	Penketh	1.1km

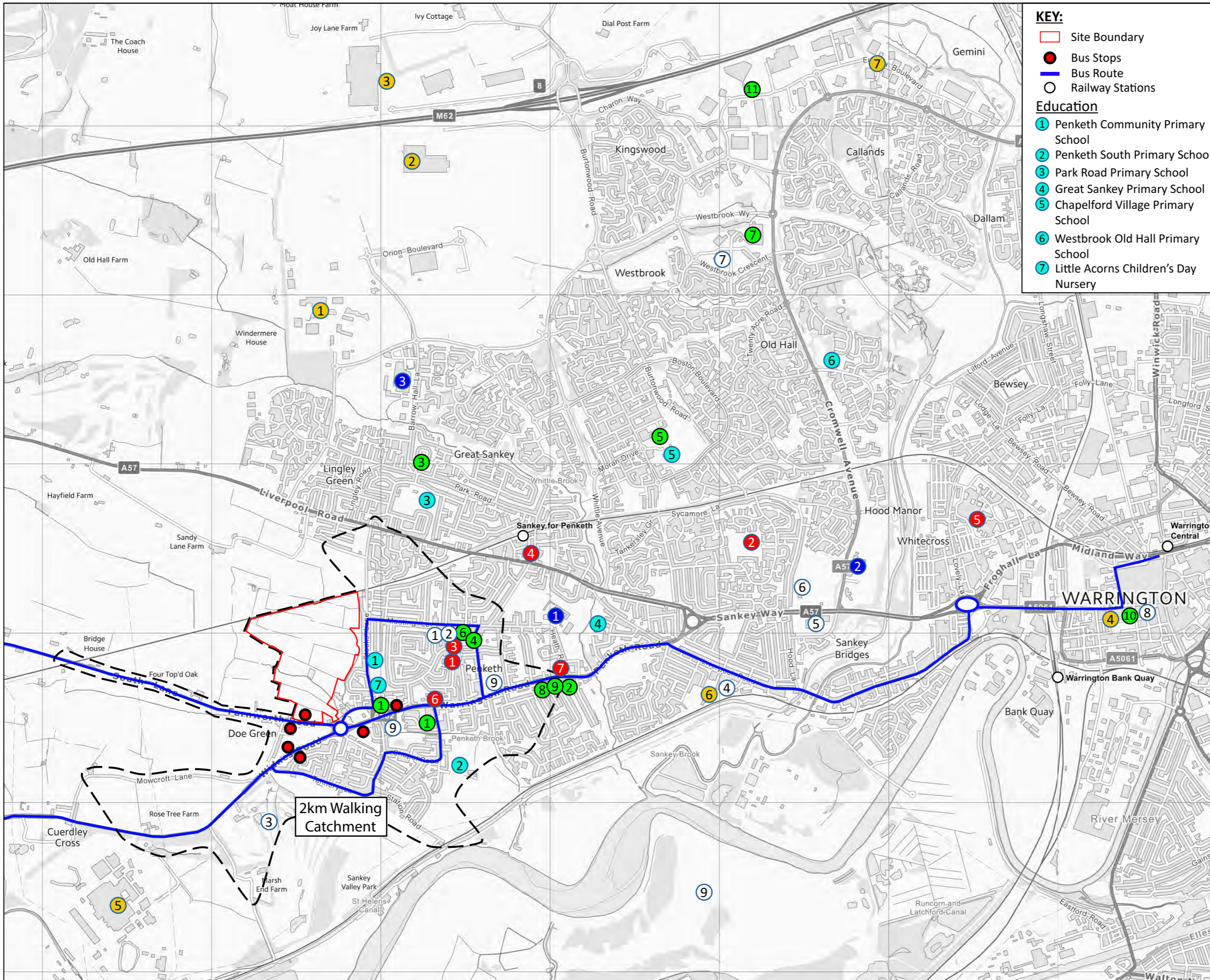


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Manchester, M3 3WR  
Tel: 0161 830 2172  
Fax: 0161 830 2173  
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- KEY:**
- Bus Stops
  - Site Boundary
  - Bus Route 32A/32E
  - Bus Route 7
  - Bus Route 110

TITLE:  
**STOCKS LANE, PENKETH  
BUS ROUTE PLAN**

FIGURE No:  
**FIGURE A1**



**KEY:**

- Site Boundary
  - Bus Stops
  - Bus Route
  - Railway Stations
- Education**
- 1 Penketh Community Primary School
  - 2 Penketh South Primary School
  - 3 Park Road Primary School
  - 4 Great Sankey Primary School
  - 5 Chapelford Village Primary School
  - 6 Westbrook Old Hall Primary School
  - 7 Little Acorns Children's Day Nursery

- 1 Penketh High School
  - 2 Saint Gregory's Catholic High School
  - 3 Great Sankey High School
- Health**
- 1 Penketh Health Centre
  - 2 Great Sankey Health Centre
  - 3 Lloyds Pharmacy
  - 4 Station Pharmacy
  - 5 Warrington & Halton Hospital
  - 6 Mydentist
  - 7 Penketh Dental Care
- Leisure**
- 1 Penketh Community Centre & Swimming Pool
  - 2 Penketh Library
  - 3 True Fit Golf Centre
  - 4 Ramp1 Indoor Skatepark
  - 5 David Lloyd Warrington
  - 6 Crossfields Recreation Club
  - 7 Odeon Cinema
  - 8 Warrington Town Centre
  - 9 Children's Play Area (Various)

- Retail**
- 1 The Co-operative Food (Various)
  - 2 Tesco Express
  - 3 One-Stop Convenience Store
  - 4 Spar (inc. Post Office)
  - 5 Sainsbury's
  - 6 Penketh District Centre
  - 7 Asda
  - 8 BP Garage
  - 9 Wynsors World of Shoes
  - 10 Warrington Town Centre
  - 11 Gemini Retail Park

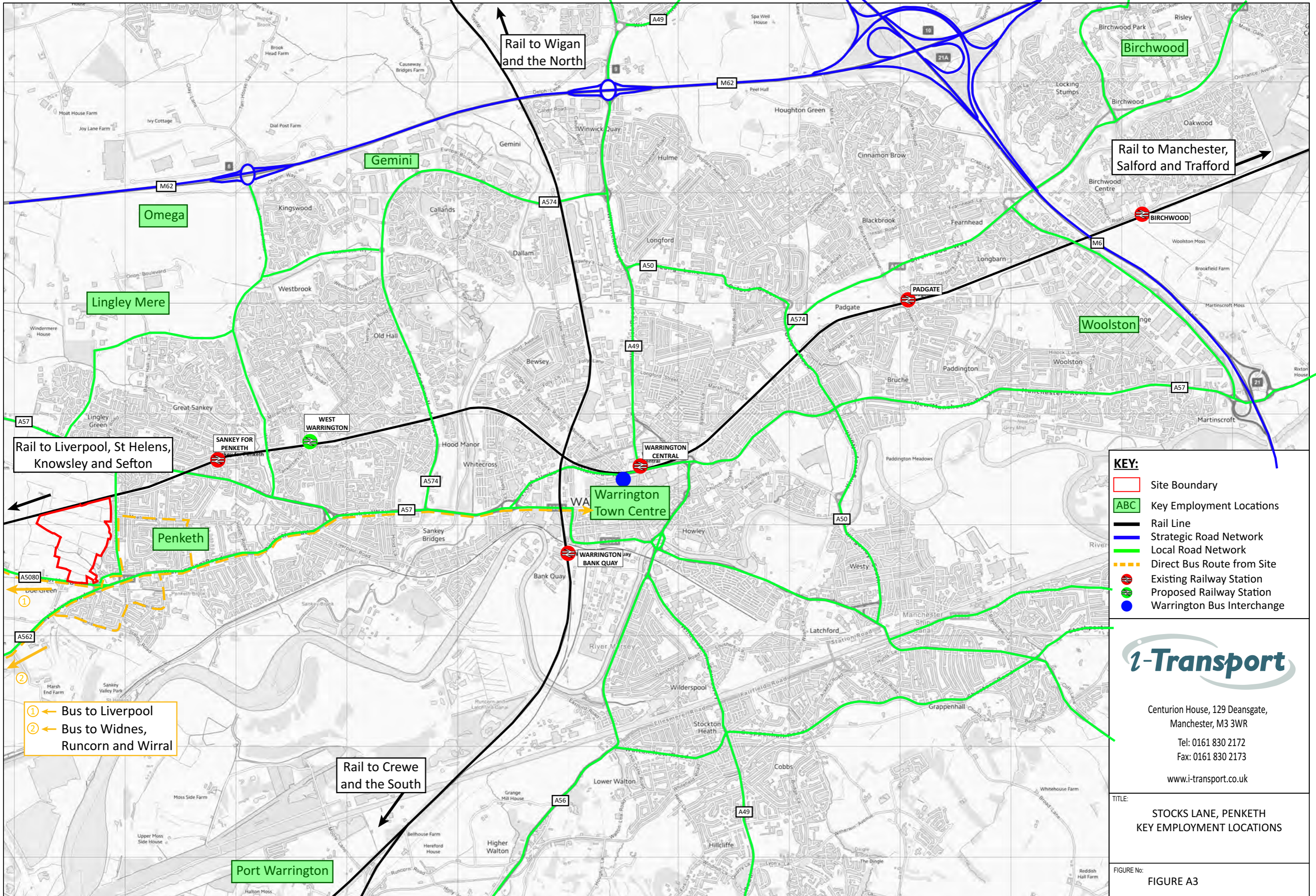
- Employment**
- 1 Lingley Mere Business Park
  - 2 Omega South Business Park
  - 3 Omega North Business Park
  - 4 Warrington Town Centre
  - 5 Fiddlers Ferry Power Station
  - 6 Penketh Business Park
  - 7 Gemini Business Park



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TITLE:  
**STOCKS LANE, PENKETH  
KEY FACILITIES/SUSTAINABILITY PLAN**

FIGURE No:  
**FIGURE A2**



Rail to Liverpool, St Helens, Knowsley and Sefton

Rail to Wigan and the North

Rail to Manchester, Salford and Trafford

Rail to Crewe and the South

① Bus to Liverpool  
② Bus to Widnes, Runcorn and Wirral

- KEY:**
- Site Boundary
  - Key Employment Locations
  - Rail Line
  - Strategic Road Network
  - Local Road Network
  - Direct Bus Route from Site
  - Existing Railway Station
  - Proposed Railway Station
  - Warrington Bus Interchange



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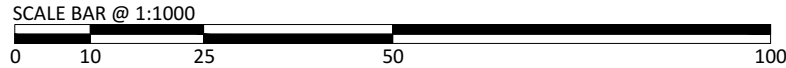
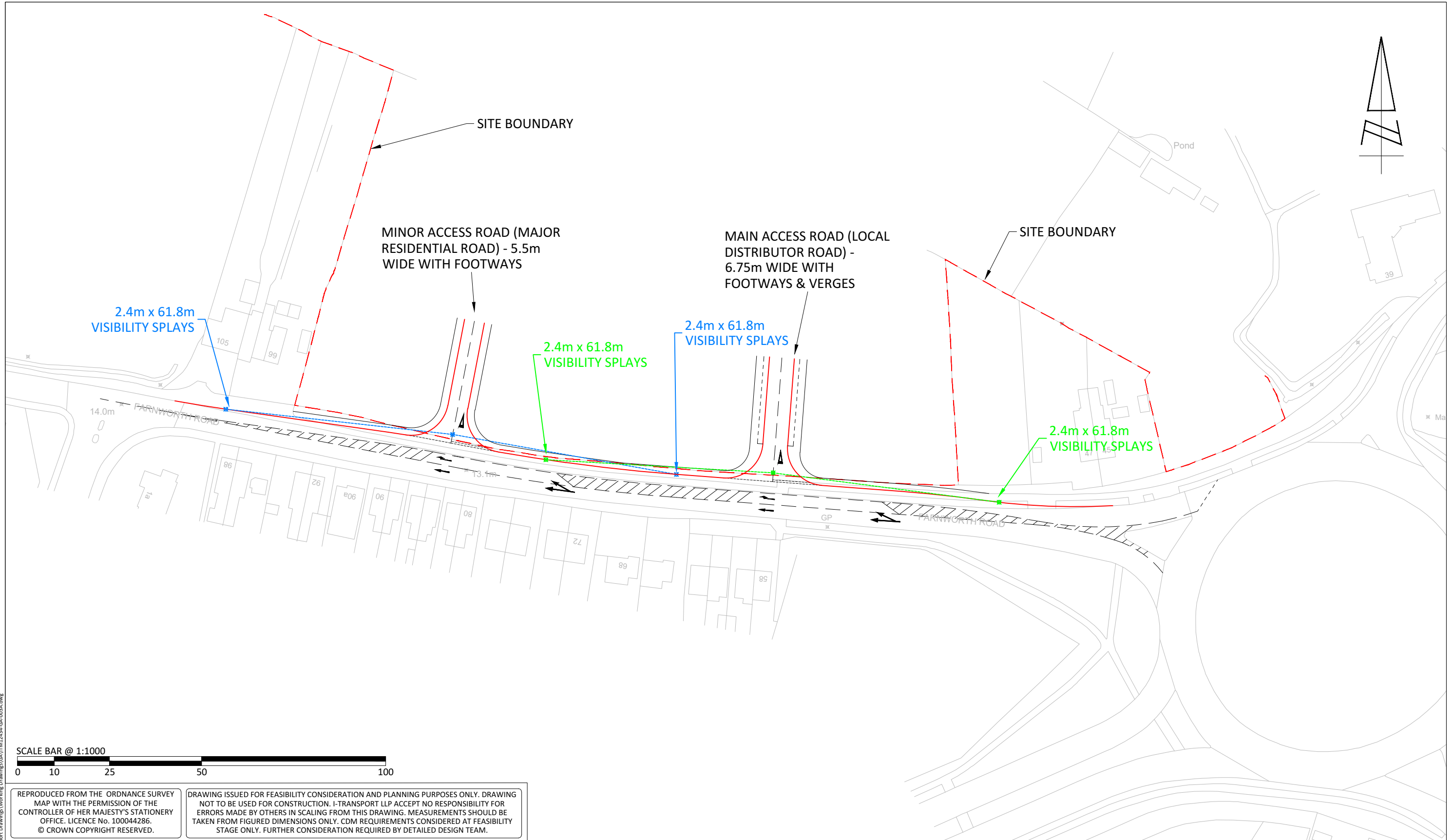
TITLE:  
STOCKS LANE, PENKETH  
KEY EMPLOYMENT LOCATIONS

FIGURE No:  
FIGURE A3



**APPENDIX B**

**PROPOSED SITE ACCESS  
ARRANGEMENTS**



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Centurion House, 129 Deansgate  
Manchester, M3 3WR  
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REV	DATE	BY	DESCRIPTION	CHK	APD
A	03.03.17	JB	ACCESS AMENDED	JO	VE
STATUS: DRAFT					

TITLE:	POTENTIAL SITE ACCESS STRATEGY	
PROJECT:	STOCKS LANE, PENKETH	CLIENT: TAYLOR WIMPEY

SCALE @ A3:	1:1000	CHECKED:	PH/JO	APPROVED:	VE
FILE REF:	ITM12434-GA-003	DRAWN:	JB	DATE:	14.02.17
DRAWING No:	ITM12434 - GA - 003			PROJECT No:	ITM12434
REV:	A				

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*E* [enquiries@i-transport.co.uk](mailto:enquiries@i-transport.co.uk)

*W* [www.i-transport.co.uk](http://www.i-transport.co.uk)

Grove House, Lutyens Close  
Chineham Court, Basingstoke  
Hampshire RG24 8AG

*T* 01256 338 640

*F* 01256 338 644

Centurion House  
129 Deansgate  
Manchester M3 3WR

*T* 0161 830 2172

*F* 0161 830 2173

4 Lombard Street  
London  
EC3V 9HD

*T* 020 7190 2820

*F* 020 7190 2821

Park House  
Park Square West  
Leeds LS1 2PW

*T* 0113 357 1360

*F* 0113 357 1361



# **WARRINGTON BOROUGH COUNCIL LOCAL PLAN PREFERRED DEVELOPMENT OPTION REGULATION 18 CONSULTATION**

**REPRESENTATION BY TAYLOR WIMPEY (UK) LTD**

**GARDEN SUBURB SETTLEMENT (REDDISH HALL FARM)**

Date: 29<sup>th</sup> September 2017

Pegasus Reference: GL/P16-0574/R006v2

## **Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

**T** 0161 393 3399 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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## 1. INTRODUCTION

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representations to the Warrington Local Plan 'Preferred Development Option Regulation 18 Consultation', which ran between 18<sup>th</sup> July and 29<sup>th</sup> September 2017.

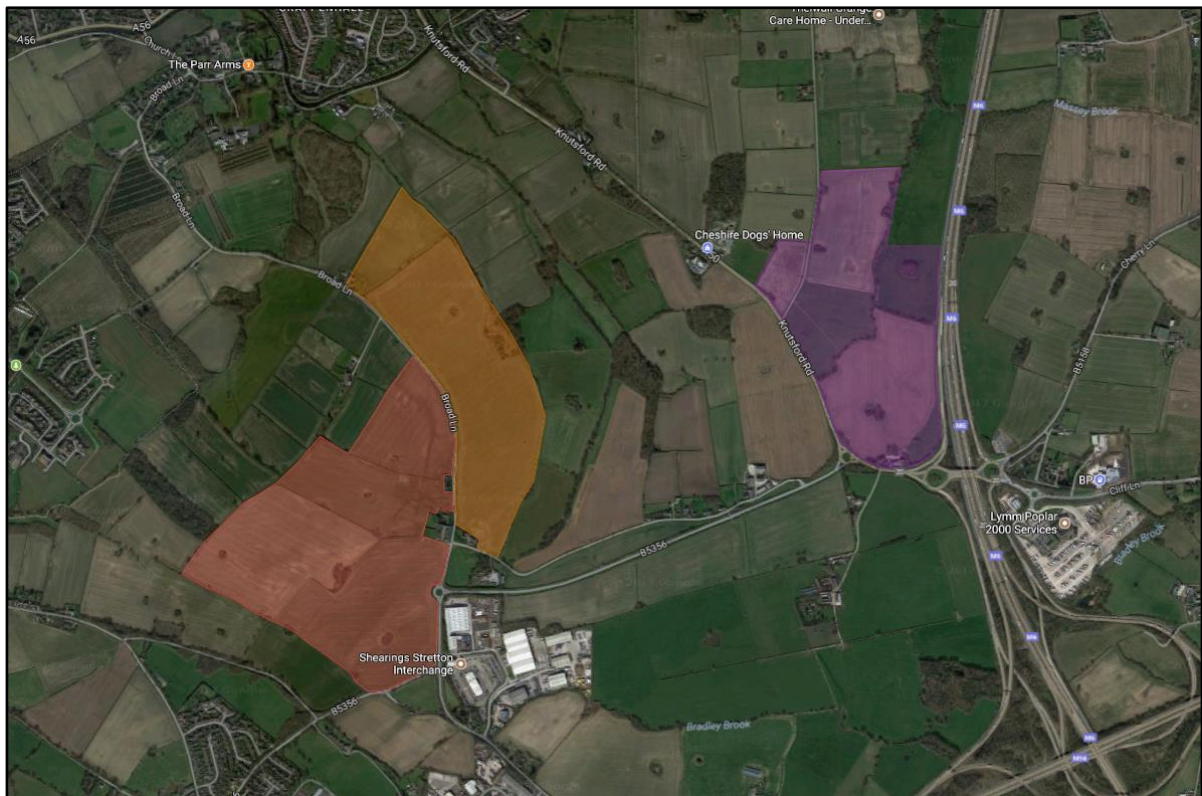
### Taylor Wimpey's Land Interest & Proposed Development

1.2 Taylor Wimpey have recently acquired a controlling interest on three separate parcels of land within the Garden Suburb Settlement (albeit all under the same freehold ownership). Figure 1.1 below depicts the three parcels:

- The Red Parcel – West of Broad Lane is approximately 118 acres (47.75 Ha);
- The Orange Parcel – East of Broad Lane is approximately 77 acres (31.16 Ha); and
- The Purple Parcel – North of Cliff Lane is approximately 93 acres (37.63 Ha).

1.3 Not all of the parcels were submitted as part of the call for sites exercise but all feature in the proposed Garden Settlement Suburb.

*Figure 1.1 – Taylor Wimpey's Promotion*



1.4 We provide further representations in a separate report, which focuses on the Regulation 18 Consultation Draft of the Warrington Local Plan. Within that document, we observe the following:

- The delivery rates for the Green Belt elements of the plan look highly ambitious and whilst there might be scope to deliver the annual targets in the latter part of the plan period, the Council will need to proactively work with land-owners and developers to ensure a vision which address the aspirations of all can be achieved.
- Sites with readily available access points should be prioritised, particularly those which will assist in opening up other land parcels that are either land locked or require new infrastructure to be in place before they can be delivered.
- The amount of Safeguarded land is not sufficient and should be disbursed across a number of sites within the Borough and within the Garden Suburb itself. Concentration in one area between Knutsford road, the M6 and Cliff Lane will not provide sufficient flexibility beyond the plan period or an equitable distribution of development.

1.5 In time, we will provide a thorough assessment of the sites and Taylor Wimpey’s aspirations for the land areas under their control. At this early juncture, however, we provide some general comments in relation to the indicative masterplan prepared by AECOM on behalf of the Council, build on the above points and address other relevant evidence based documents relevant to the Garden Suburb and the associated Taylor Wimpey land parcels.

## 2. CHARACTERISTICS OF TAYLOR WIMPEY LAND PARCELS

2.1 As noted in the previous section, Taylor Wimpey control three land parcels within the Garden Suburb and we address these in turn in terms of their suitability and deliverability; following the criteria set out within the AECOM Framework Document.

### RED PARCEL- West of Broad Lane

2.2 **Site Location** – This parcel of land is located to the west of Broad Lane and comprises 118 acres, which is currently in agricultural use. There are 4 separate fields of differing sizes, as illustrated on the aerial below. There are two large parcels to the south of the site and two smaller portions to the north of the site. Broad Lane runs along the entirety of the eastern boundary of the site. To the north, south and west of the site are open fields.

*Figure 2.1 – Land West of Broad Lane*



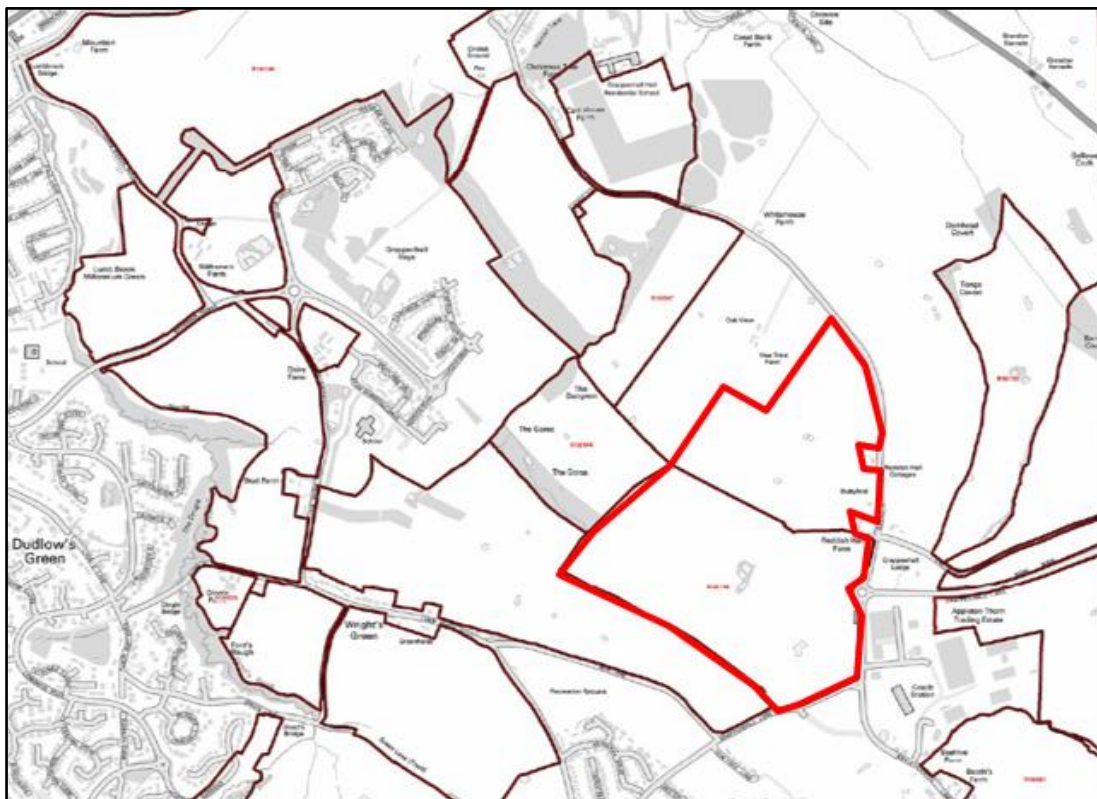
2.3 Parcel 1 measures 41 acres in size and is bound by Broad Lane to the east and the B5356 Grappenhall Lane to the south. Beyond Broad Lane to the east of the site is Applethorn Industrial Park which comprises of a number of industrial units including Cotton Club Ltd, Howley Quay Motors and Shearings Transport. The field is bound by hedgerows with some larger mature trees within this boundary. There is a small pond surrounding by trees towards the south of this field.

2.4 Parcel 2 measures 36 acres and is bound on all sides by agricultural fields. The parcel is bound by hedgerows with three small ponds surrounded by trees along the boundary with parcel 1.



- 2.5 Parcel 3 measures 24 acres and bound by agricultural fields to the north, south and west and Broad lane to the east. Along the eastern boundary, there are is a small cluster of buildings which includes office space and a small number of residential dwellings. In the north-east corner of the site, there is a cluster of 4 dwellings (two sets of semi-detached dwellings). Two of these are located within this parcel and two within parcel 4. There is a small pond surrounded by trees in the centre of the parcel with the entire parcel bound by hedgerows.
- 2.6 Parcel 4 measures 17 acres and is bound to the east and the north by Broad lane. To the west and the south, the site is bound by agricultural fields. As stated above, there are two semi-detached dwellings in the south east of the site which is part of a cluster of four dwellings. The site is bound by hedgerows with small pond surrounded by trees towards the southern boundary.
- 2.7 **Call for Sites** – Part of this site was submitted to the Call for sites Process, as shown in the extract below, Reference: R18/142. This was submitted to the Call for Sites by Pegasus Group, on behalf of Taylor Wimpey to confirm that this site is both suitable and available for residential use.

*Figure 2.2 – Call for Sites Map Extract*



- 2.8 **Landscape Character** – The wider Garden Suburb is identified as falling within National Landscape Character Area NCA 60, Mersey Valley. The site is located within four landscape character areas: 1A Stretton and Hatton, 1B Appleton Thorn, 3A Appleton Park and Grappenhall and 3B Massey Brook. These character areas do not restrict development or specify that any is more or less sensitive.

- 2.9 **Topography and Watercourses** – The site is relatively flat and sits at an elevation of 60-70m. There are no water courses running through the site and the site is located in Flood Zone 1.
- 2.10 **Vegetation and Environmental Designations** – Although there are some trees within the parcel, there are no significant mature trees or TPO's within the site boundary. In addition, there are no wildlife sites located within this site, with the nearest (The Bridgewater Canal) located 900m to the north of the site.
- 2.11 **Movement Network** – The site is well located in terms of the current highway network. Broad Lane to the east of the site and Grappenhall Lane to the south of the site are designated as key roads. In terms of access by foot, there is a public right of way on New Lane, which is located in the south west corner of the site.
- 2.12 **Historic Assets** – In terms of impact on heritage assets, this parcel will have no impact on the conservation areas, with the closest Conservation Area located over 1km north of the site. In terms of impact of listed buildings. There are 5 listed buildings within 500m of the site. Beehive Farm House is Grade II listed building located 250m south of the site on Barleycastle Lane. Given its adjacency to Applethorn Trading Park, development from this site would not be visible from this listed building and as such, this would not impact upon the setting of this listed building.
- 2.13 Booths Farm Farmhouse and the North-West side of the Farmyard are Grade II listed building and located 430m south of the site on Barleycastle Lane. These buildings are located to the south of the Trading Estate and as such, development on this site would not impact upon the historical setting.
- 2.14 Yew Tree Farm is located off Yew Tree Lane, 360m directly south of the site. This building is a Grade II listed building and is has more open views in a northerly direction. As such, development of the site may be visible from this building. Having said that, the B5356 runs between the site and this building and as such, with some sympathetic landscaping on site, any impact of its historic setting could be offset.
- 2.15 Wright's Green House and Cottage are located on Lumb Brook Lane and are Grade II listed buildings. They are located 455m west of the western boundary of the site. There are open fields in between the site and these buildings, however, subject to a sensitive landscaping scheme on site, there would be no effect from development on this site. These are also locally listed buildings, as designated in Appendix 3 of the adopted Core Strategy.
- 2.16 Bradley Hall Moated Site is a Scheduled Ancient Monument and is located 1.19km east of the site. Given that the Trading Estate sits in-between the site and this monument, we do not perceive there to be any heritage concerns as a result of development on this site. Finally, Manor Farm is designated in the adopted Core Strategy as a locally listed building. It is located 800m to the east of the site on Cartridge Lane, and as such, we do not consider this development to impact the setting of this building.

2.17 **Utilities and Site Constraints** – The ESSAR pipeline, a major oil pipeline, crosses the site from west to east and requires an easement on both sides; and there is capacity within the site to provide residential development and the relevant stand-offs. This pipeline crosses the majority of the Garden Suburb allocation and has proven not to constrain residential development to the west of the site.

2.18 **Summary:** As shown above, there are no factors which would prevent development from taking place on this site. This site is available, suitable and deliverable for residential development.

**ORANGE PARCEL - Land East of Broad Lane**

2.19 **Site Location** – This parcel of land is located to the east of Broad Lane and comprises 77 acres, which is currently in agricultural use. There are 2 separate fields, a large field to the south and smaller field to the north, as illustrated on the aerial below.

*Figure 2.3 – Land West of Broad Lane*



2.20 The smaller, northern parcel measures 12 acres. The site bound by Broad lane to the west and open fields to the north, south and east. There is a cluster of buildings along Broad Lane located in the south east of the parcel. These consist of farm buildings and residential dwellings. The site is bound by hedgerows with some larger trees within the hedgerows.

2.21 The larger, southern plot measures 65 hectares. This parcel is bound by Broad Lane to the west, Cartridge Lane to the south and open fields to the east and the west. Reddish Hall Farm is located in the south west corner of the site, which comprises of a number of farm buildings and a dwelling.

The site is bound by hedgerows, and has an area of three small ponds surrounding by trees along the eastern boundary of the site. There is one other small pond in the centre of the site.

- 2.22 **Call for Sites** – This parcel of land was not submitted the Call for Sites process.
- 2.23 **Landscape Character** – As noted above, the wider Garden Suburb is identified as falling within National Landscape Character Area NCA 60, Mersey Valley. The site is located within two landscape character areas 3A: Appleton Park and Grappenhall and 3B Massey Brook. As with the red parcel, these character areas do not restrict development or specify that any is more or less sensitive.
- 2.24 **Topography and Watercourses** – The site is flat, with a general slope upwards from north to south, ranging from 50-70m. There are no watercourses within the site boundary and this site is located in Flood Zone 1.
- 2.25 **Vegetation and Environmental Designations** – Although there are a small amount of trees within the site and hedgerows, there are no significant mature trees or TPO's within the site boundary. In addition, there are no wildlife sites located within this site, with the nearest (the Bridgewater Canal) located 440m to the north of the site.
- 2.26 **Movement Network** – The site is well located in terms of the current highway network. Broad Lane to the west of the site and Grappenhall Lane to the south of the site are designated as key roads. In terms of access by foot, there is a public right 500m to the west of the site.
- 2.27 **Historic Assets** - In terms of impact on heritage assets, this parcel will have no impact on the conservation areas, with the closest Conservation Area located over 600m north of the site. In terms of impact of listed buildings. There are 4 listed buildings within 1.2km of the site. Beehive Farm House is Grade II listed building located 600m south of the site on Barleycastle Lane. Given its adjacency to Applethorn Trading Park, development from this site would not be visible from this listed building and as such, this would not impact upon the setting of this listed building.
- 2.28 Booths Farm Farmhouse and the North-West side of the Farmyard are Grade II listed building and located 740m south of the site on Barleycastle Lane. These buildings are located to the south of the Trading Estate and as such, development on this site would not impact upon the historical setting. Yew Tree Farm is located off Yew Tree Lane, 830m to the south west of the site. This building is a Grade II listed building, however, given the Trading Estate is located in between the site and the building, development on this site would not impact the historic setting of this building.
- 2.29 Bradley Hall Moated Site is a Scheduled Ancient Monument and is located 1.2km to the south east of the site. There are some open views from the site to this monument. Having said that, the B5356 runs between the site and the monument and as such, with some sensitive landscaping in the south-east corner of the site, any impact could be mitigated against. Finally, Manor Farm is designated in the Appendix 3 of adopted Core Strategy as a locally listed building. It is located

930m to the east of the site on Cartridge Lane, and as such, we do not consider this development to impact the setting of this building.

2.30 **Utilities and Constraints** - The ESSAR pipeline, a major oil pipeline, crosses the site from west to east towards the southern boundary and as such, this will require easement measures. To the north of the parcel, there is a large parcel of land that would be able to support residential development provide a buffer.

2.31 **Summary** – As shown above, there are no constraining factors which would prevent residential development from coming forward on this site. This site should be considered as being suitable for delivering residential development in future years.

**PURPLE PARCEL Land North of Cliff Lane**

2.32 **Site Location** – This parcel of land is located to the north of Cliff Lane comprises 93 acres, which is currently in agricultural use. There are 5-6 separate fields of differing sizes and agricultural buildings within the land holding. The site is bound by the M6 to the east, Cliff Lane/Knutsford Road to the west and south and open fields to the south. Beyond these highways are open fields.

*Figure 2.4 – Land North of Cliff Lane*



2.33 Parcel 1 is the smallest parcel within this site measuring 5 acres. This parcel consists of the agricultural buildings of Howshoots Farm in the western area of the parcel. There is a dense

hedgerow along the southern boundary of the site with a small cluster of trees along the northern boundary.

- 2.34 Parcel 2 is the largest field within this parcel measuring 31 acres. The M6 runs along the eastern boundary and Cliff Lane/Knutsford Road along the western boundary. Towards the north-west of the parcel is the Massey Brook. In addition, there is a small pond surrounded by trees towards the centre of the site. The perimeter of the site is bound by a dense hedgerow.
- 2.35 Parcel 3 measures 14 acres and the perimeter is bound by hedgerows. There is a small pond within this parcel, which is located towards the western boundary. As with parcel 2, the Massey Brook runs along the southern/eastern boundary of the site. The A50 Knutsford Road runs along the western boundary and Cinder Lane to the north west. To the north of the site is open fields.
- 2.36 Parcel 4 measures 6 acres and is located towards the north of this site. The A50, Knutsford Road, is located to the west/south of the site, Cinder lane to the east and open fields to the north. The site is bound by hedgerows with a small pond surrounded by trees located adjacent to the boundary with Knutsford Road.
- 2.37 Parcel 5 measures 22 acres and is located to the north of this parcel. Cinder Lane runs along the western boundary of the site and Massey Brook along with dense hedgerows along the eastern boundary. The site is bound by open fields to the north and south of the site.
- 2.38 Parcel 6 measures 15 acres. Massey Brook/along with a dense hedgerow bound the site to the west, the M6 runs along the eastern boundary and open fields to the north and south. This parcel is part of a larger field which extends to the north. Towards the centre of this parcel, there is a cluster of trees.
- 2.39 **Call for Sites** – This parcel of land was not submitted to the Call for Sites process.
- 2.40 **Landscape Character** - As noted, the wider Garden Suburb is identified as falling within National Landscape Character Area NCA 60, Mersey Valley. The site is located within two landscape character areas 3A: Appleton Park and Grappenhall and 3B Massey Brook. As with the other parcels, these character areas do not restrict development or specify that any is more or less sensitive
- 2.41 **Topography and Watercourses** – The site is flat sat at an elevation of 30-40m towards the north of the parcel sloping upwards to 50-60m towards the south of the parcel. As stated above, the Massey Brook runs through this parcel of land. Despite the brook running through the site, this is a Flood Zone 1 area.
- 2.42 **Vegetation and Environmental Designations** – Massey Brook is designated as a Local Wildlife Site and as stated above, this runs through the site. This designation would be taken into consideration and incorporated into a masterplan to ensure it was retained and all wildlife species protected.

- 2.43 **Movement Network** – The site is extremely well located in terms of access to the local highway network. Knutsford Road, to the west of the site is a major A road and the M6 to the west is a major motorway. In terms of pedestrian access, there is a public right of way in the north-west corner of the site. There is also access to another public right of way from Cliff Lane on the southern boundary of the site.
- 2.44 **Historic Assets** – In terms of impact on heritage assets, this parcel will have no impact on the conservation areas, with the closest Conservation Area located over 1.5m north of the site. In terms of listed buildings, there are no listed buildings in close proximity which would be impacted by residential development on this site.
- 2.45 Having said that, Bradley Hall Moated Site is a Scheduled Ancient Monument located 500m to the south of the site. There are some open views from the site to this monument. Having said that, the Cliff Lane runs between the site and this monument. In response to this, a sensitive landscaping scheme could be implemented which would ensure that any impact that would occur from developing this site would be mitigated against.
- 2.46 There is a cluster of local listed buildings in and around Grappenhall, however, these are located over 600m to the north of the site and as such, this development would not impact upon their setting/character.
- 2.47 **Utilities and Constraints** - The ESSAR pipeline, a major oil pipeline, crosses the site from west to east dividing the site into two smaller parcels. Due to the location of this pipeline, easement measures will be needed as a buffer around this pipeline. Having said that, the pipeline divides the site into two sizeable parcels which are both capable of accommodating residential development.
- 2.48 **Summary:** As shown above, this site has no constraining factors which would prevent development on this site and as such, should be considered as deliverable, available and suitable for residential development.

### 3. DELIVERY OF MASTERPLAN AND WIDER GARDEN SUBURB PROPOSAL

3.1 The previous section reviewed the characteristics and suitability of Taylor Wimpey’s individual landholdings within the Garden Suburb, but we now look at deliverability issues within the wider Garden Suburb, as raised in our general representations; and how the masterplan might be refined to address these issues to accelerate delivery.

#### The Proposal & Concept Masterplan

3.2 The Warrington Garden City Suburb is identified in Chapter 5 (page 40) of the main consultation document, where it is proposed for approximately 7,000 units to be delivered over the 20 years of the plan, including an extensive employment area and 3 Garden Neighbourhoods centred around a new District Centre and Country Park.

3.3 The anticipated trajectory is set out in Table 19, and a Conceptual Masterplan at Figure 7 which are based on a Framework Plan Document prepared by AECOM.

	0-5	6-10	11-15	16-20	Total
Garden City Suburb	406	496	48	0	950
Garden City Suburb (Green Belt)	0	2,114	2,096	2,114	6,324
<b>TOTAL</b>	<b>406</b>	<b>2,610</b>	<b>2,144</b>	<b>2,114</b>	<b>7,274</b>

3.4 The chosen Garden Suburb option was refined from:

- 1) *High Level Spatial Option 2 'Majority of Green Belt release adjacent to main urban area with incremental growth in outlying settlements' at Stage 3;*
- 2) *Garden Suburbs of varying sizes (4,000, 6,000 and 8,000 dwellings) formed 3 of the 6 components of the Development Options at Stage 4, based on Area Profiles and Sustainability Appraisal evidence;*
- 3) *These components were included in 4 of the 5 Development Options at Stage 4, with Option 2 chosen – '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';*

3.5 Whilst we have some comments on how this wider development option was arrived at, we fully support the identification of the Garden Suburb and note that the identification of significant employment land, schools and retail units within the allocation will provide a level of self-sufficiency and reduce pressure on the Warrington Urban Area in terms of commuting and associated congestion.

3.6 We also welcome the high level masterplanning work undertaken to date; albeit this will need to be explored in significantly more detail before the next version of the plan is released and will require input from all landowners and developers involved. Indeed, it is suggested that some clarity is provided over how this strategic allocation will be managed and brought forward and whether this will require a separate DPD/Area Action Plan document, as this could obviously have



implications on delivery. A more coherent analysis of individual land parcels would assist in demonstrating a robust phasing programme for delivery, and we provide some suggestions on this below.

### ***Wider Deliverability Issues***

- 3.7 As noted in our general representations, we disagree with the preferred development option on the basis that it is over-reliant on a small number of large strategic sites, which will ultimately limit choice in the market, and the opportunities for some small/medium sized housing developers to be engaged, whilst it is also likely to lead to significant under delivery in the earlier years of the plan period. To demonstrate this, we provided our own deliverability assessment in our general representations.
- 3.8 In respect of the Garden Suburb, we note how applying Lichfields empirical evidence on delivery of large urban extensions suggests a 10.8 year lead in time for delivery to begin and an average build rate of 161 dpa; which would lead to less than a quarter of the dwellings in the Green Belt being delivered within the plan period (1,449 of 6,324), with nearly 5,000 pushed beyond 2036.
- 3.9 We strongly believe that this particular Garden Suburb can exceed this and deliver 300-400 units a year; because it is of a larger scale than the 2000+ category used by Lichfield's and benefits from significant road frontages offering a good number of access points and an existing internal road structure, meaning there is scope for a substantial number of sales outlets operating at any one time.
- 3.10 This will only be achieved if the Council work closely with the development industry and landowners on a comprehensive masterplan, which facilitates the early delivery of those parcels that open up land parcels that are currently inaccessible (either due to constraints on the existing network or by virtue of being land-locked).
- 3.11 As such, we would recommend that an early meeting is arranged by the Council with all land owners and promoters to facilitate this shortly after the closure of this current consultation period; with reference to our detailed comments below.
- 3.12 Finally, we also disagree with allocating all the safeguarded land in one location, as this could generate similar delivery issues into the next plan period.

### **Detailed comments on the Masterplan**

- 3.13 We now provide more detailed comments on the deliverability of the masterplan and proposed phasing arrangements, taking account of the relevant NPPF and NPPG guidance, which confirms that to be considered deliverable, sites should, at the point of adoption of the relevant local development document:
- Be available – there is confidence that there are no legal or ownership problems.

- Be suitable – it offers a suitable location for development and would contribute to the development of sustainable and mixed communities.
- Be achievable – there is a reasonable prospect that housing will be developed on the site at a particular point in time.

3.14 We address each of these elements in turn.

***Availability***

3.15 Taylor Wimpey have legal control over the three parcels set out in sections 1 and 2 and are seeking to develop these at the earliest opportunity. Furthermore, there are no ransom strips, tenancies or other ownership problems which could prevent or delay this.

3.16 The site is therefore in the control of a major national housebuilder, with a proven track record, and must be regarded as wholly available.

3.17 In terms of wider availability within the Garden Suburb, the AECOM Framework Document notes that over 20 ‘call for sites’ submissions were made in the allocated area; which covers a total area of 1,227.8 Hectares.

3.18 We counted 8 individual ‘call for sites’ submissions for residential development in the Garden Suburb, covering an area of 330.16 Ha. This suggests that only a quarter (26.9%) of the allocation has actually been promoted for residential development, and is therefore confirmed as available. Even if this is combined with the 116.8 Ha of proposed employment land then only a third of the land is confirmed as available (36.3%).

3.19 Whilst we acknowledge that much of the Taylor Wimpey land has not been promoted previously (part of the red parcel forms part of call for sites R18/142), and that other landowners may become active now the site has been allocated, there is no guarantee of this and it is worrying that nearly two thirds of this area could technically be considered unavailable at this stage.

3.20 This brings the deliverability of the masterplan into question, and provides further evidence that the Council need to engage with all landowners and promoters in the area as soon as possible before progressing to the next stage of the plan.

3.21 Until further landowners are engaged it is suggested that residential development is directed towards those parcels that are being actively promoted, and are confirmed as suitable; otherwise early delivery will not be achieved and a 10+ year lead-in time becomes a distinct possibility.

***Suitability***

3.22 In respect of suitability, section 2 details the individual site characteristics and constraints of the three Taylor Wimpey parcels and confirms that there are no technical issues preventing their development.

- 3.23 Moving onto wider suitability issues and constraints within the Garden Suburb, we note the following.
- 3.24 **Landscape Character** – The six individual landscape character areas across the site do not restrict development or specify that any is more or less sensitive; whilst the wider Arup Green Belt Assessment concluded that General Area 10 made a weak contribution to the Green Belt and General Area 9 a moderate contribution. This suggests that the whole area can be developed without generating adverse landscape impacts.
- 3.25 **Topography and Watercourses** – Whilst there are several rivers and brooks within the wider area, the vast proportion of the land is within Flood Zone 1 and is therefore relatively unconstrained in drainage terms.
- 3.26 In respect of topography the site slopes gently down from the motorway in the south to the urban area in the north creating an even and well contained landscape, again supporting development across the whole site.
- 3.27 **Vegetation and Environmental Designations** –The majority of local wildlife sites are located around the Appleton/ Grappenhall fringe and the Bridgewater Canal to the north of the Garden Suburb; whilst clusters of mature trees are spread more widely through the site, they are more prevalent to the north, and will therefore mainly affect the proposed residential parcels to the north (B1- B5), the northern part of the safeguarded land, and the Country Park.
- 3.28 As such these parcels will need to consider how they integrate with the urban fringe, whilst maintaining the relevant wildlife corridors and stand-offs.
- 3.29 The Taylor Wimpey parcels are relatively unconstrained in this respect suggesting they could potentially support higher density development.
- 3.30 **Movement Network** – The Garden Suburb is generally well connected to the motorway network with local connections running north south (A49/A50) and east west (B5356); albeit it is acknowledged that significant improvements will be required, including to public transport.
- 3.31 All three Taylor Wimpey parcels have direct access onto the existing road network, either at Broad Lane and Knutsford Road; whilst the red and purple parcels are flanked by public rights of way, which can be integrated with the development and preserved.
- 3.32 However, as noted previously, some parcels and ownerships do not have direct access to these main roads and therefore early delivery should be prioritised on sites such as Taylor Wimpey’s parcels which can open up these land-locked parcels.
- 3.33 **Historic Assets** – The majority of the Listed Buildings are clustered around Grappenhall, to the north of the allocation (closest to parcel B1 and some of the safeguarded residential land), and around Appleton Thorn/ Appleton Thorn Trading Estate to the south (close to parcels A4, B10, B9

and the District Centre); which will need careful consideration, albeit there is no suggestion that these will prevent development on these parcels.

- 3.34 The three Scheduled Ancient Monuments within the site could cause greater concern, particularly Bradley Hall Moated Site in the south west corner of the Garden Suburb within the employment area; as this large allocation is likely to have substantial impact on its setting. This would potentially support moving the employment land further north, and exchanging it or integrating it with the safeguarded land to the north, to allow a longer period to address the heritage issues or at the very least softening the landscape somewhat by providing a mix of uses and preventing it from being wholly employment based.
- 3.35 **Utilities and Site Constraints** – The ESSAR pipeline passes through all three of the Taylor Wimpey parcels and will traverse the proposed District Centre and strategic road network. Given its significance it is suggested that the Council engage the relevant statutory undertakers as part of the engagement process to identify the strategic implications and opportunities for mitigation.
- 3.36 Otherwise it appears the wider area is relatively well served by existing services, and can work around other physical constraints.

### **Achievability / Delivery**

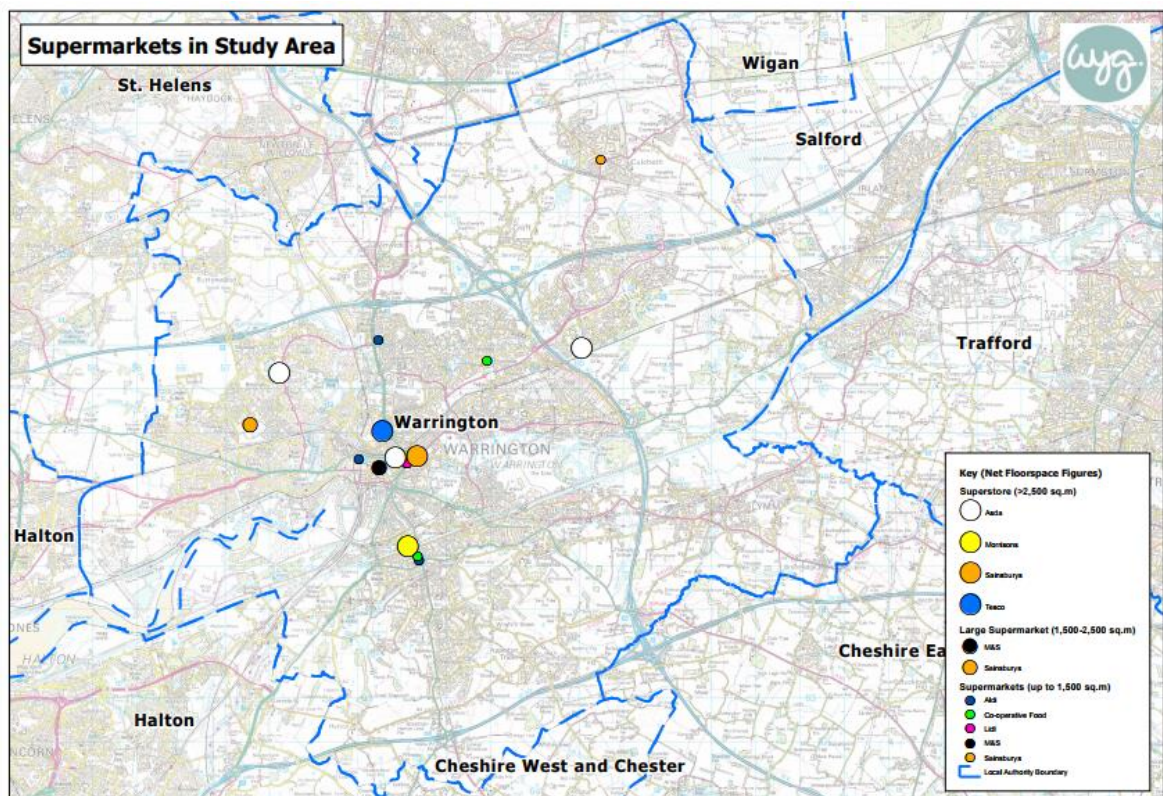
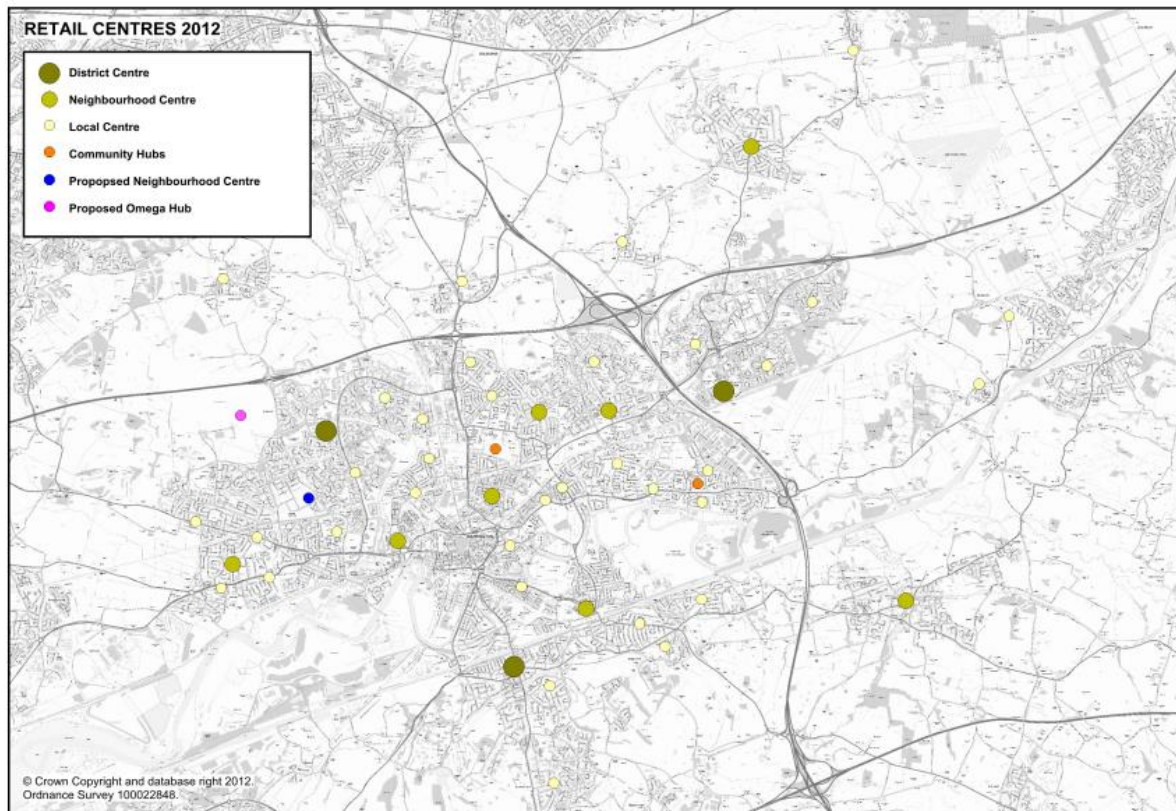
- 3.37 Taking account of the availability and suitability issues outlined above we make the following comments and suggestions on the overall layout and phasing of the development, with reference to the phasing plans shown at page 37 (Figures 4.1-4.4) of the AECOM Framework document:

#### *District Centre/ Retail Provision*

- 3.38 The Council's proposals show the District Centre towards the centre of the overall Garden Suburb site and the need for 4 other local village centres within the Garden Suburb. Whilst we do not dispute the need for a range of uses to come forward within the Garden Suburb, no detailed evidence on the quantitative and qualitative need for retail and leisure development has been provided which fully aligns with the Local Plan preferred options. As such, we reserve the right to provide further comments once this evidence base has been established.
- 3.39 With regard to the proposed location of the District Centre, if it were a new, standalone settlement, its central location within the Garden Suburb site could be regarded as logical and having merit. However, the new suburb will function as an extension to Warrington, which has an existing town centre hierarchy and other retail and leisure provision within the existing urban area. The proposals for new retail centres, therefore, need to be considered in this context. Once again, its location needs to be considered in light of up to date evidence on existing shopping and leisure patterns, the quantitative and qualitative need for new floor space (as noted above), and a health check of existing centres within the vicinity.

- 3.40 With regard to its proposed scale, the Council’s masterplan indicates the proposed District Centre is a very large area of land (totalling 55 Ha). Again, this scale needs to be tested in light of up to date evidence on retail shopping patterns and the extent of expenditure that will be generated by the Garden Suburb development of 7,000 + units and the wider South Warrington area.
- 3.41 Connected to the points we raise about its location, scale and deliverability, the current masterplan illustrates that the District Centre will only be flanked by 4 development parcels (B8, B9, C2 and C3). These provide a notional total of 1,288 residential units, with the majority of the proposed District Centre bounded by the employment area to the south and Country Park to the north. This only provides a very limited number of residential units that could be said to be within walking distance from the new centre, which we do not consider to be sustainable in terms of promoting alternate travel modes but also sustaining a range of businesses that will be dependent on day to day footfall.
- 3.42 This issue is compounded by the fact that the District Centre is due to come forward in Phase 2, with just 260 residential units delivered in the same phase on parcel B9. Clearly this will not be conducive in delivering a vibrant and viable district centre early on in the development of the Garden Suburb, which we consider will be critical if the entire development proposal is to be successful in attracting new residents and businesses.
- 3.43 We note the Council commissioned WYG to undertake a Retail and Leisure Study, which was published in 2015. This followed a Retail Centres Study carried out in 2012. Neither account for the level of housing growth put forward in the Local Plan. As such, it is not a complete evidence base for the purpose of assessing what is the most appropriate retail and leisure (and other service uses) strategy for the Garden Suburb proposal.
- 3.44 However, we have reviewed the WYG evidence and Retail Centres study and observe the following provision is located in relatively close proximity to the Garden Suburb:
- 1 District Centre (Stockton Heath) and 5 Local Centres;
  - 1 large ‘main-food’ supermarket (Morrisons), 1 Discounter supermarket (Aldi); and several small convenience stores.
- 3.45 Compared to the provision in the northern parts of Warrington, it is evident that the southern part of Warrington is comparably under provided for (albeit this does reflect the extent of the existing urban area and population).

Figure 3.1 – Retail Centres and Supermarkets in Warrington



- 3.46 In terms of the quantitative need for convenience goods, Table 7.3 of the WYG assessment confirms a deficit up to 2025 and the need for only 1,000-1,900 sq m by 2030.
- 3.47 Future comparison goods floorspace requirements are higher at 12,000-21,100 sq m by 2025 and 24,700-41,100 sq m by 2030 (Table 26c – Appendix 5 of the WYG Assessment).
- 3.48 Whilst some of this need, could be directed towards a new District Centre, we would expect Warrington Town Centre to be the principal target for accommodating comparison retail floorspace given it will sit higher in the town centre hierarchy and will be the first centre in which to apply the sequential test as required by the NPPF when locating new retail floorspace. The same could be said for the convenience floorspace need but it is accepted that this is best met as locally as possible given the regular need to purchase such goods.
- 3.49 Whilst the extent of this need will need to be tested and cross checked with the anticipated population growth within the Local Plan (which could increase the requirement), we do note that Table 1 (Appendix 5) of the WYG study already accounts for sizable population growth within the Warrington Zones. Moreover, some of this expenditure growth will be taken up with existing retail commitments within the Study Area as shown in Table 6d and 26d, Appendix 5 the WYG assessment.
- 3.50 In short, the proposal for a new district centre will need to be fully tested in terms of need (as required by paragraphs 23 and 116 of the NPPF), and the sequential test (as required by paragraph 23 of the NPPF). The NPPF also notes that policies should be set for retail provision that is not within a town centre. In this case, it will be prudent to ensure that any retail floorspace does not have an adverse impact on existing centres. This should be considered through the Local Plan process and if that is not possible, it will be necessary for any applications for retail, leisure and office space to be tested in the context of paragraphs 26 and 27 of the NPPF (the impact tests).
- 3.51 To conclude, in order to deliver a successful District Centre, it will be necessary to fully explore the extent of the need and what population within its immediate catchment area will be necessary to ensure it is successful. Moreover, in order to give any District Centre the best start, it would be logical to move it closer to the existing population or to locations in close proximity to the first phases of substantial housing delivery. For instance, a location further northwest towards the existing communities of Grappenhall, Appleton, and Grappenhall Heys (within or around parcels B1-B5) would seem ideal as it would generate footfall and patronage from existing and new residents, helping to get the District Centre up and running in Phases 1 and 2.
- 3.52 We recognise this would place it in closer proximity to Stockton Heath District Centre but according to the WYG assessment, Stockton Heath is a very healthy centre and the Morrison's store is significantly overtrading by £16.8m per year<sup>1</sup> (with evident congestion issues on the ground). This

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<sup>1</sup> See paragraph 7.49 of WYG 2015 Assessment

would suggest the centre and key retail provision within it would be able to withstand some impact and the diversion of some trade is likely to deliver a better customer experience for existing residents in the area overall.

- 3.53 It would also be logical for the secondary school (which is due to form part of the District Centre) to be located closer to existing residents, given there is only one other secondary school in South Warrington (Bridgewater High School).
- 3.54 The alternative would be to locate more residential development around the District Centre early on in the delivery process but this would require relocating or amending the position of the Country Park and employment land designations.
- 3.55 As such it is our strong view that the District Centre should be moved from its current location.

#### Country Park

- 3.56 Given the ecological constraints, it would be logical to provide some open space in this general location to the north of the Garden Suburb. However, at 84 Ha, this is very large area. There has been no quantitative analysis presented of the need for open space, or consideration of whether this would be better spread around the allocation within a clear network of green infrastructure, linking smaller communities, and therefore it is possible that this could be moved further north and additional residential land allocated.
- 3.57 Indeed, there is scope for a substantial linear park through the Garden Suburb by virtue of the ESSAR pipeline and its extensive stand-off zone. We note that this aspiration is depicted on one of the masterplan iterations but does not appear to translate to the more detailed zonal plan to the fullest effect. Provision of a high quality green lung through the Garden Suburb connecting to existing open space towards Stretton (where the pipeline continues), could help reduce the extent of the proposed Country Park whilst ensuring substantial green infrastructure is delivered through the master planning process.
- 3.58 A linear park of this nature could also assist in defining alternative strong boundaries for alternative Safeguarded Land locations to the south.

#### Employment Land

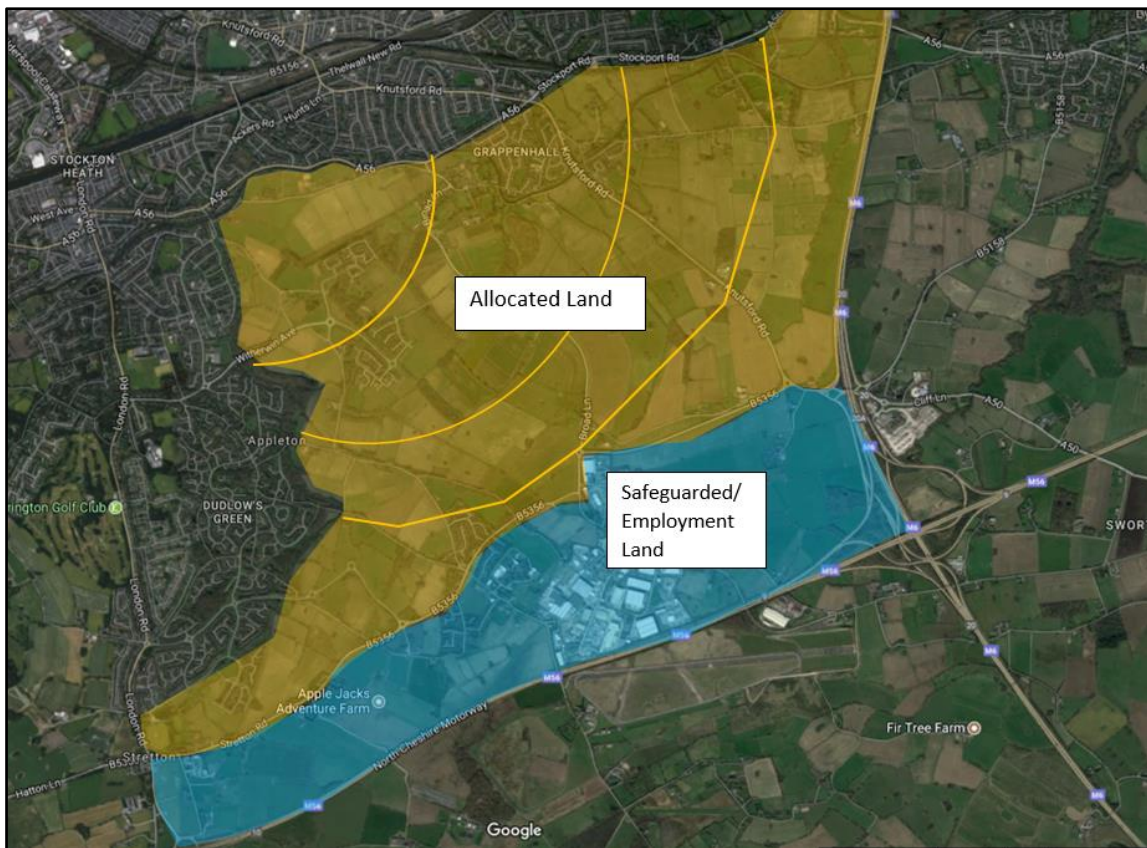
- 3.59 Moving or splitting the employment land would be another option, and we have already noted in respect of heritage constraints that it may be beneficial to exchange this for safeguarded residential land to the east of Knutsford Road to soften the landscape here; whilst it is our general view that the safeguarded land should be dispersed more evenly across the Garden Suburb and borough as a whole.



Safeguarded Land

- 3.60 It is considered that a more logical phasing of development would be to grow Warrington out from the existing urban edge, in concentric phases (albeit ignoring the employment allocation which needs to be next to the motorway junction). Importantly, this option should be explored through the SEA as a reasonable alternative.
- 3.61 This would result in safeguarded land being identified south of Grappenhall Lane (B5356) or the proposed/suggested linear park (see above), which would provide equally defensible boundaries for the longer-term development and particularly for development beyond the plan period as this would then focus on the M56 boundary to the south.

*Figure 3.2 – Alternative Phasing Plan*



- 3.62 The above plan and alternative proposals are indicative at this stage and we reserve the right to make further comments and develop our case as the masterplan evolves. In fact, we suggest that the Council undertake full consultation with the relevant landowners before the masterplan and phasing proposals are refined further, starting with an initial meeting as suggested above.

#### **4. CONCLUSIONS**

4.1 We fully support the identification of the Garden Suburb allocation, and have demonstrated that the three parcels within it and under the control of Taylor Wimpey are sustainable and deliverable in the context of the wider allocation and could all support residential or other development.

4.2 To assist in the masterplanning process we have suggested a meeting with all relevant landowners and promoters at the earliest convenience, noted where further evidence and justification is required and also suggested how the masterplan might be amended and refined to help facilitate early delivery, including the following recommendations:

- Phasing development in a concentric manner so it logically extends the existing outer urban edge of Warrington;
- Fully explore the need for a new District Centre in quantitative and qualitative terms, and determine if this need is best met within the Garden Suburb or existing nearby centres through the application of the sequential test.
- Assuming a District Centre is required, fully test its impact on existing centre to ensure the scale is appropriate.
- If a District Centre is required, relocate it closer to existing residential communities to drive footfall and early take-up of units or concentrate more substantial levels of new housing around it within an early phase of delivery.
- Reducing the size of the Country Park pushing it north with residential development to the south, and supplement this green infrastructure with a high quality Linear Park along the route of the existing ESSAR pipeline.
- Dispersing the safeguarded land more evenly across Warrington and across the Garden Suburb with obvious locations located to the south of Grappenhall Lane or the proposed Linear Park.