

**Local Plan**  
Planning Policy and Programmes  
Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
WA12NH

**Date:** 17 June 2019  
**Our ref:** 42154/03/CM/NMi/17534457V1  
**Your ref:**

By email: localplan@warrington.gov.uk

Dear Sir/Madam


### **Warrington Local Plan Proposed Submission Version Consultation**

I refer to the above consultation and herewith attach representations on behalf of Story Homes. The representation documents comprise the following:

- 1 Completed Representation Form
- 2 Representations Report for Land at Runcorn Road, Higher Walton
- 3 Warrington South West Urban Extension Development Prospectus
- 4 Runcorn Road, Higher Walton Vision Document
- 5 Representations Report for Land at Reddish Lane, Lymm
- 6 Reddish Lane, Lymm Vision Document
- 7 Representations Report for Land at Warrington Road, Culcheth
- 8 Warrington Road, Culcheth Vision Document

Please can you confirm receipt of these representations by return.

Yours faithfully



**Nicholas Mills**  
Senior Planner

Copy  
Rosie Chant - Story Homes



# Proposed Submission Version Local Plan Representation Form

## Introduction

Please read the appended documents and guidance notes before completing this representation form.

- Advice and Guidance on completing this representation form
- Proposed Submission Version Local Plan (full plan)
- Data Protection and Privacy Notice ([https://www.warrington.gov.uk/privacy\\_policy](https://www.warrington.gov.uk/privacy_policy))
- Statement of Representations Procedure

*The guidance notes are taken from "Examining Local Plans Procedural Practice" published by The Planning Inspectorate and will assist you in making your representations effectively.*

More information can be found by visiting [www.warrington.gov.uk/localplan](http://www.warrington.gov.uk/localplan)

**The form is split into 3 parts:**

**Part A Your details** – 3 questions (only complete this part once)

**Part B Representation Form(s)** – 8 questions (fill in a separate form for each representation you wish to make)

**Part C Customer 'About You' questionnaire** – 9 questions (only complete this part once)

**All representations must be received by the Council no later than 5.00pm on Monday 17th June 2019. Please note that late representations will not be accepted.**

Should you encounter any problems completing the representation form please email [localplan@warrington.gov.uk](mailto:localplan@warrington.gov.uk)

## PART A-About You

1. **Please complete the following:** Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment)

\*Name of person completing the form: Nicholas Mills

Email address: nicholas.mills@lichfields.uk

2. **What type of respondent are you?** Please select all that apply.

A local resident who lives in Warrington

A person who works in Warrington

Local Borough, Town or Parish Councillor

Local Business owner/Manager

A group or organisation

Visitor to Warrington

An agent

Other (please specify):

3. **Please complete the following:**

Organisation name (if applicable): Stary Homes

Agent name (if applicable): (cto Lichfields)

\*Address 1: [ship Canal House, 98 King Street]

\*Address 2: [Manchester]

\*Postcode: [M2 4 WU]

Telephone number: (0161 837 6130)

## PART B - Representation Form 1

1. To which part (chapter/policy) of the Local Plan does this representation relate?

Please see the attached representations reports for details.

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

A paragraph number(s)

A policy sub-number(s)

Both of the above

None of the above

If a paragraph or policy sub-number then please use the box below to list:

Please see the attached representations reports for details.

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant	<input checked="" type="radio"/>	<input type="radio"/>
Sound	<input type="radio"/>	<input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	<input checked="" type="radio"/>	<input type="radio"/>

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Please see the attached representations reports for details.

**5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.**

Please be as precise as possible.

Please see the attached representations reports for details.

{Continue on a separate sheet and anadl if necessary}

**6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).**

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

Please see the attached representations reports for details.

{Continue on a separate sheet and anadl if necessary}

**Please note:** your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he / she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination (I understand details from Part A will be used for contact purposes)

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There is the need to examine some fundamental aspects of the local plan. We would therefore like the opportunity to participate at the oral part of the examination.

{Continue on a separate sheet and attach if necessary}

**8. If you wish to attach documents to support your representation form then please submit with your response and provide a description of each document in the box below.**

**Comments/ file description**

Cover letter; Representations Report for Land at Runcorn Road, Higher Walton; Representations Report for land at Reddish Lane, Lymm; Representations Report for Land at Warrington Road, Culcheth; Warrington South West Urban Extension Development Prospectus; Runcorn Road, Higher Walton Vision Document; Reddish Lane, Lymm Vision Document; Warrington Road, Culcheth Vision Document.

{Continue on a separate sheet and attach if necessary}

■

# **Warrington Proposed Submission Version Local Plan**

## **Representations on behalf of Story Homes**

**Land at Reddish Lane, Lymm**

**June 2019**

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42154/03/CM/NMi



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## 1.0 Introduction

### Purpose

1.1 Lichfields is instructed by Story Homes [Story] to make representations to the Warrington Proposed Submission Version Local Plan [Local Plan] published for consultation by Warrington Council in April 2019. These representations follow previous representations to the Local Plan Preferred Development Option which were submitted on behalf of Story by other parties in September 2017.

1.2 **These representations are made in the context of Story’s development** interests in Warrington at:

- 1 Reddish Lane, Lymm; and,
- 2 Rushgreen Road, Lymm.

1.3 The following documents accompany these representations:

- 1 Reddish Lane, Lymm Vision Document (September 2017).

1.4 Story considers that their site at Reddish Lane, Lymm comprises a deliverable and sustainable **site for residential development and should be allocated to meet Warrington’s housing need and** growth aspirations. It should be noted that since the original representation the **extent of Story’s** land interest has changed, and additional land is now included within the scope of these representations. Details of this additional land are set out in Section 8.

1.5 It is a statutory requirement that every development plan document must be submitted for **independent examination to assess when it is “sound”, as well as whether other statutory** requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the National Planning Policy Framework [the Framework].

1.6 There is no **statutory definition of “soundness”**. However, the Framework states that to be sound a Local Plan should be:

- 1 Positively prepared – **providing a strategy which, as a minimum, seeks to meet the area’s** objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 2 Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3 Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
- 4 Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.7 In addition, the Framework<sup>1</sup> states that:

*“Plans and decisions should apply a presumption in favour of sustainable development.*

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<sup>1</sup> The Framework - §11

*For plan-making this means that:*

- a *Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b *Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - i *The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

1.8 Whilst Story Homes generally supports the policies of the emerging Local Plan it considers that a number of policies may require amendments in the context of the tests of soundness established by the Framework in order to be found sound.

## Structure

1.9 Representations to the following Local Plan policies are provided in this report:

- 1 Policy DEV1 – Housing Delivery
- 2 Policy DEV2 – Meeting Housing Needs
- 3 Policy GB1 – Green Belt
- 4 Policy INF1 – Sustainable Travel and Transport
- 5 Policy INF5 – Delivering Infrastructure
- 6 Policy ENV7 – Renewable and Low Carbon Energy Development
- 7 Section 10 – Site Allocations

## 2.0 **Policy DEV1 – Housing Delivery**

### Introduction

- 2.1 Policy DEV1 sets out the housing requirement for the 20 year plan period from 2017-2037 as a minimum of 18,900 new homes (945 dpa).
- 2.2 The policy identifies the housing distribution which proposes the majority of new homes (13,726 dwellings) to be delivered within the existing urban areas of Warrington, and the removal and allocation of two Green Belt sites known as the Garden Suburb (6,490 dwellings) and the South West Urban Extension (1,631 dwellings). In addition, a minimum of 1,085 homes are to be delivered on allocated sites removed from the Green Belt, including 200 homes in Culcheth and 430 homes in Lymm.
- 2.3 **The policy proposes a ‘stepped’ housing requirement as follows:**
- a 2017-2021 (first 5 years) – 847 homes per annum
  - b 2022 to 2037 (following 15 years) – 978 homes per annum
- 2.4 The policy states that the Council will give consideration to a partial review of the plan should monitoring indicate that a 5-year deliverable and /or subsequent developable supply of housing can no longer be sustained.

### Housing Requirement

- 2.5 The Warrington Local Plan Core Strategy [WLPCS], adopted in July 2014, sets out the Council's vision, aims and strategy for the Borough, including the overarching planning policies that will guide growth during the period to 2027.
- 2.6 However, in February 2015 the High Court quashed parts of the Warrington Local Plan Core Strategy, specifically:
- 1 Policy W1 and Policy CS2, and specifically to *“delivering sufficient land for housing to accommodate an annual average of 500 dwellings (net of clearance) between 2006 and March 2027, and a minimum of 10,500 over the whole period”*; and,
  - 2 Paragraph 6.38 relating to the delivery of *“1,100 new homes as a sustainable urban extension to West Warrington.”*
- 2.7 The Council has resolved to prepare a new Local Plan, rather than seek to alter the Core Strategy to resolve the issues raised by the High Court. As part of the formulation of the evidence base for the new Local Plan, the Council has reviewed its Local Housing Need [LHN] using the standard methodology and alternative, employment-led, approaches.
- 2.8 Story welcomes the **Local Housing Need Assessment’s** [LHNA] use of the 2014 Sub-National Population Projections [SNPP], the Sub-National Household Projections [SNHP] and the Mid-Year Population Estimates [MYE]. Furthermore, Story **agrees with GL Hearn’s revised** methodology which does not seek to adjust the SNPP to take account of Unattributable Population Change [UPC]; provides an uplift to counter falling household formation rates amongst younger households; and in particular, seeks to align with economic growth needs. Story **considers that the Council’s approach in respect of the calculation of LHN is, in general, positively prepared and supports Warrington’s proposals to cater for its own housing need** within its authority area. However, Story has some general comments as set out below.
- 1 The Council’s **LHN is aligned with a level of** job growth that is well below what has been achieved in recent years and which is inconsistent with the employment land target. This

could result in a number of negative externalities including unsustainable commuting patterns. The assumptions underpinning the GL Hearn analysis are significantly over-inflating the age cohorts likely to comprise the bulk of the labour force in the years ahead, thus boosting job growth without a commensurate increase in housing need. **GL Hearn’s** modelling suggests that a growth of 7,530 residents aged 15-64 will somehow support an increase of 16,200 economically-active residents, and 19,100 jobs (954 p.a.). This appears unlikely.

- 2 **The Council’s evidence suggests that they are planning for a level of employment land** growth based on past take up rates, which equates to 362 ha going forward. By way of comparison, over that same time period, this level of B-Class land sustained 1,641 additional jobs annually – a figure more than 70% higher than the 954 p.a. job growth the 945 dpa figure equates to (see Table 3 in WBC’s Economic Development Needs Assessment report). This indicates that the level of employment land that the Council is planning for will generate a level of job growth considerably in excess of the level that could be serviced by the increase in labour supply resulting from 945 dpa.
- 3 Story has concerns with **GL Hearn’s approach to calculating the annual affordable housing** requirement. **However, even taking the Council’s evidence at face value,** the LHNA identifies a very high level of affordable housing need of 377 p.a. This represents a significant increase on the 250 dpa figure in the 2017 SHMA, suggesting that the situation is deteriorating. GL Hearn concludes that the affordable housing need (377 dpa) delivered at a rate of 25% of all delivery would require a total delivery of 1,508 dpa, although they are quick to clarify that this is not likely to be deliverable or realistic. Nevertheless, the LHNA explores the scale of uplift that could be appropriate to address needs:

*“However, the Council could still consider an increase to the OAN as per the PPG to deliver more affordable homes. There is no set methodology for how to do this, but other areas have used a nominal 5% or 10% uplift to the OAN when developing their housing requirement.*

*Given the affordable housing requirement in Warrington we have given consideration for such an uplift in Warrington if the 5% is applied to the OAN of 909 then we would arrive at a housing requirement of 955 dpa.*

*Ultimately this uplift above the standard methodology is a choice for the Council but a requirement of around 950 dpa would seem reasonable to examine and also aligns with the economic-led need.” [paragraphs 8.29-8.31]*

The Council appears to have ignored this advice and has retained the 945 dpa figure in its emerging Local Plan with no uplift to help meet the very high need for affordable housing.

- 2.9 Story considers that the Council should be planning for a higher LHN figure in the Local Plan in order to ensure that the above matters are addressed.

## Housing Distribution

- 2.10 Story generally supports the overall distribution strategy identified in the policy but considers that land at Reddish Lane, Lymm should be released from the Green Belt and allocated for residential development in order to help meet the housing requirement for the settlement.

## Housing Trajectory

- 2.11 The Housing Trajectory and Stepped Housing Supply set out in Policy DEV 1 and at Appendix 1 of the Submission Local Plan sets out WBC’s current position on its housing trajectory of

deliverable and developable sites. This assessment has been prepared following the revised **Framework definition of ‘deliverability’ and the publication of the Housing Delivery Test [HDT]** results.

- 2.12 The Housing Trajectory suggests a total of 20,643 homes could be delivered over the plan period, of which 4,132 units would be delivered over the course of the first 5 years of the plan. The annual average delivery over the first five years of the plan is 826 dwellings, which equates to 87% of the 945 dpa LHN, and even below the stepped requirement of 847 dpa for the first 5 years. Story acknowledges that WBC has applied a stepped trajectory to its housing requirement but is concerned that this serves only to push housing supply further back into the plan period. Indeed, given that Policy DEV1 (6) refers to 5 year monitoring and states that the Council will give consideration to a review or partial review Story is concerned that the Council should plan positively now and ensure that it identifies sufficient sites to support the **Government’s objective of significantly boosting the supply of homes. This is discussed in more detail below.**
- 2.13 The PPG<sup>2</sup> states that a stepped requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. It states that strategic policy-makers will need to set out evidence to support using stepped requirement figures, and not seek to unnecessarily delay meeting identified development needs. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.
- 2.14 In this instance, WBC has applied a stepped trajectory to accommodate for the increased delivery later in the plan period of the Waterfront, South West Urban Extension and Garden Suburb. At present, the Council cannot demonstrate a 5YHLS even with a stepped trajectory of 845 dpa for the first 5 years (equal to 4,225 homes), as Appendix 1 indicates that even if all the housing sites proceed precisely as planned, only 4,132 homes (826 dpa) are deliverable.
- 2.15 In addition, the results of the HDT indicate that WBC should apply a 20% buffer to the assessment of five-year housing land supply. This has not been included within the Submission Local Plan, which gives further weight to the argument that the authority cannot demonstrate a 5YHLS against the Local Housing Need.
- 2.16 The Submission Local Plan (Appendix 1) sets out a Housing Trajectory and Stepped Housing Supply over the course of the Plan period. This indicates that 4,132 units can be delivered over the course of the first 5 years of the plan from sites within the urban area and on Green Belt sites. Applying a 20% buffer as per the HDT would suggest that a requirement of 5,082 is needed – a shortfall of 950 units.
- 2.17 The PPG sets out how local authorities can demonstrate that they have a confirmed 5YHLS as part of the plan examination<sup>3</sup>:

*“The NPPF gives local planning authorities the opportunity to demonstrate a confirmed 5 year supply of specific deliverable housing sites. This needs to be done initially through the plan examination process, and may then be refreshed annually following adoption (provided the plan remains up to date), through the preparation of an Annual Position Statement. In both these circumstances, it will only be possible to establish a confirmed 5 year supply if an appropriate buffer has been applied and the authority’s assessment of its supply has been tested sufficiently through the examination or Annual Position Statement process.”*

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<sup>2</sup> Practice Guidance - ID: 3-034-20180913

<sup>3</sup> Practice Guidance – ID3-049-20180913

- 2.18 Story therefore considers that the Council is unable to demonstrate a defensible five-year housing land supply position at the current time and should explore every avenue available to increase the supply of housing in the short term (In the first 5 years of the plan at least).
- 2.19 Part 6 of Policy DEV1 states the following:
- “Should monitoring indicate that a 5- year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan”.***
- 2.20 Story considers that the most effective way of ensuring sufficient housing supply is to identify **‘Plan B’ sites. In addition to allocating additional sites and identifying safeguarded land in the Local Plan a new policy should be introduced which provides a mechanism for its early review i.e. a ‘Plan B’ (such as adopted West Lancashire Local Plan Policy RS6 which is attached at Appendix 1). Specific sites should be identified as ‘Plan B’ sites now. This will ensure that the Local Plan is flexible and can respond quickly to the potential non-delivery of committed sites and any other shortcomings in its housing land supply.**
- 2.21 It is crucial that the Council monitors its housing land supply position and where it is found to have fallen below an identified trigger point, it will permit these Plan B sites to come forward. This would ensure greater flexibility as it would remove the need for a formal plan review process to be undertaken if additional sites that are not allocated for housing are needed to **boost the borough’s** housing supply.
- 2.22 **If there is a need for the release of Green Belt to provide sufficient ‘Plan B’ sites, these sites** should be identified for release now. If there is then still an insufficient supply of housing, after Plan B sites have been implemented the Council can at that point enact an early review of the Local Plan.
- 2.23 Without such a mechanism in place, the Local Plan may not deliver the significant boost in **housing that is required to meet the needs of the Borough and the Government’s objective of** significantly boosting the supply of homes.
- 2.24 For the reasons out in these representations Story Homes consider that the Reddish Lane site should be released from the Green Belt and allocated for residential development for the reasons set out in Section 10. However, should the Council determine that allocation is not necessary or appropriate, **it is considered that the site should be identified as a ‘Plan B’ site.**

#### Supply beyond the Plan Period

- 2.25 The Framework [§139] advises that where necessary plans should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period and be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.
- 2.26 At the Local Plan Preferred Development Option Stage the Council proposed to remove further land from the Green Belt so that it could be safeguarded to meet development needs for a further 10 years beyond the Plan period. However, Story notes that the Proposed Submission Local Plan does not propose the identification of any safeguarded land to meet needs beyond the Plan period as the Council considers that there is likely to be a sufficient supply to meet housing needs for at least 10 years following. Table 4.2 of the Local Plan identifies the development needs beyond the Plan period and the indicative housing supply 2037 to 2047 as follows:



Table 2.1 Development needs beyond the Plan Period

<b>Indicative Housing Requirement 2037 to 2047</b>	
Annual household growth 2027-37*	617
Projected forward 2037 to 2047	6,170
Number of homes required 2037 to 2047* *	6,312
<b>Indicative Housing Supply 2037 to 2047</b>	
Additional supply within Plan from flexibility	1,890
Illustrative town centre capacity	1,816
Small sites allowance	608
Garden Suburb delivery post 2037	2,289
<b>Total indicative supply</b>	<b>6,603</b>

Source: Warrington Proposed Submission Version Local Plan Table 4.2

\* 2014 Based Household Projections

\*\* Based on calculation used in LHNA

- 2.27 The Local Plan [§4.1.24 to 4.1.26] states that rate of increase in households has decreased significantly over the last 10 year period of the Plan. It notes that over the period 2027 to 2037 household growth will reduce to an annual average of 617 homes per annum (2014 based household projections). It also notes that house price affordability will no longer be a significant issue and therefore any uplift beyond the household projections will be minimal. In addition, it states that the rate of job growth is forecast to decrease over time resulting in sufficient new homes to provide a balance with future jobs growth. However, given the uncertainties of making such projections so far into the future, Story Homes considers that a more sensible approach would be to apply the Local Plan annual requirement target beyond the Plan period rather than using a reduced figure.
- 2.28 Given the significant timescale until the end of the Plan period, Story is also concerned that the sources of supply identified to meet needs over this period may not deliver as anticipated. For example, whilst the plan is providing a 10% flexibility factor, the key purpose of this will be to ensure that sufficient homes are provided over the plan period in the event that sites do not deliver as anticipated. On this basis Story considers that this flexibility cannot be applied to the period beyond. There is also no guarantee that the illustrative town centre capacity will deliver as anticipated, as it could be the case that this land comes forward for alternative uses or its development is precluded for other reasons, such as land ownership. The identification of safeguarded land provides more certainty over where future development needs can be met beyond the plan period.
- 2.29 In order to ensure that Green Belt boundaries will not need to be altered at the end of the plan period, Story considers that the Local Plan should identify safeguarded land around the main urban area and outlying settlements. For the reasons set out in these representations, Story Homes consider that the Reddish Lane, Lymm site should be released from the Green Belt and allocated for residential development. However, should the Council determine that allocation or identification as a 'Plan B' site is not necessary or appropriate, it is considered that the site should be identified as safeguarded land.

## Tests of Soundness

- 2.30 Story Homes is concerned that Policy DEV 1 is at risk of failing the tests of soundness for the following reasons:
- 1 It is not positively prepared: There is a risk that the objectively assessed needs will not be met.

- 2 It is not Justified: The evidence in the LHNA is not considered to be robust.
- 3 It is not effective: It will fail to deliver much needed housing in the early years of the plan.
- 4 It is not consistent with national policy: The provision of a deliverable five year housing land supply in accordance with the Framework [§73] will not be achieved. It fails to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

## Recommended Change

- 2.31 To address the conflict above and ensure the Policy is sound, it is requested that the Local Plan:
- 1 Reviews its housing requirement in light of the comments made above.
  - 2 Identifies additional allocations to help meet housing need in the early years of the plan period.
  - 3 **Identifies 'Plan B' Sites' to ensure that any shortfall in housing supply over the Plan period can be met.**
  - 4 Identifies safeguarded land to ensure that Green Belt boundaries will not need to be altered at the end of the plan period

3.0

## Policy DEV2 - Meeting Housing Needs

### Introduction

31

Policy DEV2 deals with meeting housing needs including affordable housing, housing type and tenure, optional standards, housing for older people, self and custom build, and other needs.

### Consideration of Policy

32

Part 7 of the policy deals with housing type and tenure and Table 3 of the Local Plan provides a suggested mix breakdown based on the LHNA. Story Homes notes that the suggested mix for Affordable Housing (rented) properties differs between the LHNA and Local Plan as shown in Table 3.1.

Table 3.1 Warrington LHNA and Local Plan suggested affordable housing (rented) mix

	1-bed	2-bed	3-bed	4+ bed
Affordable housing (rented) in LHNA	30-35%	30-35%	25-30%	5-10%
Affordable housing rented in Local Plan	20-25%	40-45%	20-30%	5-10%

Source: Warrington LHNA and Local Plan

33

The reason for this difference is not explicitly stated in the Local Plan. If it is not a drafting error Story considers the reason for this difference should be explained in the explanatory text to Policy.

34

Part 9 of the policy states the following:

*'In residential development of 10 dwellings or more, the Council will seek that 20% of homes should be provided to Building Regulation Standard M4(2) 'Accessible and Adaptable dwellings'.*

35

Story considers that a blanket requirement for 20% on sites of 10 dwellings is not justified. There is no clear explanation as to why a 20% requirement has been applied, as this is not specifically recommended in the LHNA.

36

Story recognises the value of providing accessible and adaptable dwellings for those sectors of society which require them. However, Story is also concerned that the process used to identify requirement in the LHNA does not fully address the requirements of the Practice Guidance. More specifically, no assessment of the accessibility and adaptability of existing stock appears to have been undertaken as required by the Practice Guidance<sup>4</sup>. It could be the case that a significant proportion of the existing stock is capable of helping to meet the identified need which would reduce the need for further provision.

37

With regard to the provision of dwellings meeting M4(2) standards the LHNA [page 89] suggests that there is a need to increase the supply of adaptable dwellings. It suggests that the Council could consider (as a starting point) requiring all dwellings to meet M4(2) Standards. For the reasons set out above we do not consider that such a requirement has been justified in the LHNA. However, the LHNA also recognises that this level of provision would not be appropriate and states:

<sup>4</sup> Practice Guidance - ID: 56-007-20150327

*“It should, however, be noted that there will be cases where this may not be possible (e.g. due to viability or site specific circumstances) and so any policy should be applied flexibly”.*

3.8 The Local Housing Needs Assessment therefore recognises that there may be circumstances in which provision is inappropriate.

3.9 Story considers that the recommendations on requirement should be reassessed to take into account the accessibility and adaptability of existing housing stock. Transparent evidence should also be provided to fully explain how any requirement identified has been derived. Flexibility should be provided in the Policy to allow for instances where any requirement level set may not be possible due to site specific circumstances.

3.10 Part 11 of the Policy states:

*“In residential development of 10 dwellings or more, 20% provision must be made to accommodate the needs of older people. The nature of this provision will be determined on a site by site basis depending on demand in a particular area and the appropriate type of provision for the site and/or scheme”.*

3.11 The explanatory text to the policy [§4.1.57] states that

*“For elderly people this may range from sheltered accommodation, residential care homes, extra care or adaptable homes depending on the nature of the site and proposals, and demand in the local area. For residential care homes a minimum of 80-120 bedroom spaces would be needed to reach the necessary critical mass to run a 24/7 operation. For sheltered housing a smaller number of approximately 30 units (or fewer) is acceptable.”.*

3.12 The land take for such uses could therefore have a significant impact upon the development potential of sites for general market housing and upon development viability. The Framework [§34] is clear that such policies should not undermine the deliverability of the plan. Story notes that the impact of this requirement upon site viability does not appear to have been factored **into the Council’s Viability Assessment.**

3.13 Story is also concerned that, as this requirement could possibly include adaptable homes, there **may be an element of ‘double counting’ given that Part 9 of the policy also sets out a** requirement for adaptable homes.

3.14 For the above reasons, Story considers that this requirement is not justified and that this need would be better met through the allocation of specific sites which specifically provide for the types of accommodation identified.

## Tests of Soundness

3.15 Story is concerned that Policy DEV2 would not meet the tests of soundness because:

- 1 It is not justified: The Local Plan evidence base does not support a policy which sets a 20% blanket requirement for accessible and adaptable dwellings and a 20% requirement for Housing for Older People, in residential development of 10 dwellings or more. There is also the risk of **an element of ‘double counting’** given that both parts 10 and 11 of the Policy could require adaptable homes.
- 2 It is not consistent with national policy: The impact of accommodating the needs of older people upon site **viability does not appear to have been factored into the Council’s Viability Assessment**, contrary to the Framework.

## Recommended Changes

3.16

In order to help ensure the policy is sound it is considered that:

- 1 The requirement for accessible and adaptable dwellings should be reassessed to take into account the accessibility and adaptability of existing housing stock. Transparent evidence should also be provided to fully explain how any requirement identified has been derived. Flexibility should be provided in the Policy to allow for instances where any requirement level set may not be possible due to site specific circumstances.
- 2 Part 11 of policy DEV2 should be deleted and land should be allocated that specifically provides for the types of accommodation identified.

## 4.0 **Policy GB1 – Green Belt**

### Introduction

- 4.1 Policy GB1 identifies the areas of land which are proposed for removal from the Green Belt in **the Local Plan. The draft Proposals Map shows Story’s land at Reddish Lane, Lymm as remaining within the Green Belt.**

### Consideration of Policy

- 4.2 The Local Plan sets out the exceptional circumstances sought by the Framework [§137] to justify the release of Green Belt land. This includes a demonstration of the exceptional circumstances for each area, including the outlying settlements, the purpose of which is to increase and support the vitality and viability of local services. Story Homes agrees that an exceptional circumstances case has been demonstrated for the release of Green Belt land within the outlying settlements. The Council is considered to have examined that all other reasonable options for meeting its identified need for development and that there is not enough brownfield land to meet its needs and meet the requirements of the Duty to Cooperate. Green Belt release in order to promote sustainable patterns of development is the only option available to the Council.

### Land at Reddish Lane, Lymm

- 4.3 However, for the reasons set out in previous representations to the Local Plan, Story has a number of concerns with the assessment of the Reddish Lane site as it is considered that the Reddish Lane Site does not need to be permanently open and no longer performs a Green Belt function. It would also deliver a sustainable form of development. These are summarised below.
- 4.4 The Green Belt **Assessment is undertaken at two levels, for both ‘general areas’ and specific land parcels.** In terms of the general area assessment Area 6, which has been assessed as being of **‘moderate’ value. Story have no comments on this level of assessment.**
- 4.5 The October 2016 parcel assessment study identified the site as parcels LY8 and LY9 which were considered to have an overall contribution of strong (LY8) and moderate (LY9). In addition to this, the July 2017 assessment considered individual parcel assessments submitted to the call for sites consultation. Here, Reddish Lane is referenced as R18/082 and parcels LY8 and LY9 are considered to have a strong contribution to the Green Belt.
- 4.6 This is primarily due to the assessment considering that the contribution of both parcels LY8 and LY9 to the third purpose of allocating Green Belt land (as restated in the NPPF): safeguarding the countryside from encroachment, **as having a ‘strong contribution’.** The assessment states that the boundaries of LY8 and LY9 (R18/082) to the existing built-up area **are ‘non-durable’ garden boundaries** and thus that the Green Belt plays an important role in protecting the adjacent land from encroachment. It also states that the boundaries of these parcels to the open countryside are strong, with the northern area being bound by the Transpennine Trail. It is considered that the proximity to the Transpennine Trail has been given limited weight in the assessment. Although not in use, the railway line does perform an urbanising feature in the landscape given that the line was engineered to accommodate the former Manchester to Warrington line.
- 4.7 Overall, it is considered that the analysis has been incorrectly applied to the concluding analysis, **which assess both parcels as making a ‘strong’ contribution to this purpose.**

- 4.8 The comparison assessment table within the Vision Document submitted with these representations sets out Story's assessment of the site in comparison to the assessment of R18/082. A copy of this table is also included at Appendix 2 for ease of reference.
- 4.9 Instead of assessing the value of the parcel land on the current situation the assessment should properly consider the impacts of releasing and developing the parcels, because the purpose of the study is to inform the release of land for housing. If parcels LY8 and LY9 (R18/082) are developed the settlement edge will be their northern boundaries, which are considered by Story to be strong and durable. The impact of development will therefore be to create a stronger, more defensible settlement edge, which will therefore better safeguard the adjoining countryside from encroachment. It is therefore considered that the assessment for both these sites should be **'moderate' contribution and not strong. This view was supported by the Council's position for this site in preparing the 1994 Local Plan which was endorsed by the Inspector's conclusions.**
- 4.10 Although parcels LY8 and LY9 (R18/082) lie alongside the edge of the Conservation Area, it is considered that any impacts on its setting can be mitigated with good design and an appropriate site landscape strategy.
- 4.11 When preparing the 1994 Local Plan, the Council originally proposed that this land should not be designated as Green Belt and this decision was firmly supported by the Inspector. Although **the Council since gave way to objectors and designated the land as Green Belt, the Inspector's reasoning remains relevant and compelling.** In his report the Inspector refers to the land east of Reddish Lane (corresponding with parcel LY9 in Green Belt Assessment and then referred to as Area of Search 14).
- 4.12 He concludes (in paragraph 3.AS14.3 onward) that this land:
- "does not, in my opinion, have the appearance of open countryside. From several vantage points it is seen against the backdrop of residential properties to the west and south...And, significantly, along the northern boundary the embankment represents an appreciable visual and physical barrier. These features, in combination, create a noticeable measure of containment around the allocation land. As such there is a distinct contrast, in terms of character and appearance, between this Area of Search and the extensive stretch of open countryside beyond the former railway.*
- ... If development were eventually to be permitted here it would be well contained by the northern boundary feature and would not represent encroachment into open countryside.*
- ...the Council's decision not to designate the Reddish Lane land as part of the proposed Green Belt is entirely justified."*
- 4.13 Although more than twenty years have since passed since this was written, there has been very little recent development in this area and the position here today is very much as the Inspector described it. In addition, landscape planting has strengthened the northern boundaries over the timescale, further enhancing the enclosed nature of parcels LY8 and LY9.

## Land at Rushgreen Road

- 4.14 The **Council's** October 2016 Green Belt Assessment included an assessment of individual parcels and identified the Rushgreen Road site as part of parcel LY9 which was considered to have an overall contribution of **'Moderate'**. In the July 2017 Green Belt Assessment of SHLAA sites, the Rushgreen Road site was assessed as an individual parcel [R18/016] and was considered to have **an overall contribution of 'Weak'**. **The Council's own evidence base would therefore support the removal of the Rushgreen Road site from the Green Belt.**

## Tests of Soundness

- 4.15 Policy GB1 is considered to fail the tests of soundness for the following reasons:
- 1 It is not justified: **The Council's assessment** of this part of the Green Belt at Reddish Lane, Lymm is considered to be flawed and does not reflect the findings of previous Local Plan Inspectors Report.

## Recommended Change

- 4.16 To address the conflict above and ensure the Policy is sound, it is requested that the Council:
- 1 Updates the Green Belt Study evidence to remove land at Reddish Lane, Lymm from the Green Belt and allocates the site being promoted by Story for residential development.



## 5.0 **Policy INF1 – Sustainable Travel and Transport**

### Introduction

- 5.1 Policy INF1 seeks to deliver the Council objectives of improving the safety and efficiency of the transport network, tackling congestion and improving air quality, promoting sustainable transport options, reducing the need to travel by private car and encouraging healthy lifestyles.

### Consideration of Policy

- 5.2 Part 1(j) of the policy states that the Council will expect development to consider how it can be futureproofed, through the provision of measures to support new and emerging technologies, such as Autonomous Vehicles.
- 5.3 Whilst Story recognises the potential benefits of futureproofing development, there can be no guarantee that some forms of new and emerging technology will ever reach the mass market. It is therefore difficult to foresee which forms of technology will need to be supported through development at the current time. In any event, it is likely that technology such as autonomous vehicles will be designed to adapt with existing development, and futureproofing may not therefore be required to accommodate it.

### Tests of Soundness

- 5.4 Story is concerned that Policy INF1 would not meet the tests of soundness because:
- 1 It is not justified: Story considers that it will not be possible to futureproof development as suggested as it is not possible to foresee what forms of new and emerging technology will ever reach the mass market

### Recommended Change

- 5.5 In order to ensure that Policy INF1 is sound, it is considered that Part (j) of the policy should be deleted.

## 6.0 **Policy INF5 – Delivering Infrastructure**

### Introduction

6.1 Policy INF5 requires development to provide or contribute towards the provision of the infrastructure needed to support it.

### Consideration of Policy

6.2 Part 6 of the policy states that:

*“The Council will only consider the viability of development proposals at the planning applications stage where:*

*a. required planning obligations are in addition to those considered as part of the Local Plan’s viability appraisal; or*

*b. where there are exceptional site specific viability issues not considered as part of the Local Plan’s viability appraisal.*

***In these cases, applicants should provide viability evidence through an ‘open book’ approach to allow for the proper review of evidence submitted and for reasons of transparency. The Council will then be able to balance the benefits of the proposals against any harm arising from not securing the full planning obligation requirements”.***

6.3 The supporting text to the policy [§7.5.7] states that on larger site allocations, including the proposed urban extensions, the infrastructure requirements for the first 5 years of the plan have been identified in detail.

6.4 Whilst the Council has considered the implications of infrastructure provision in its Viability Appraisal to a certain extent, Story considers that the Council's evidence needs to demonstrate, in a transparent way, how all of the Policy requirements within the draft plan have been factored into the Assessment on an item by item basis.

6.5 This will help to avoid the need for the submission of further viability evidence to be provided at the planning application stage.

### Tests of Soundness

6.6 Story is concerned that Policy INF5 would not meet the tests of soundness because:

6.7 It is not justified: The information provided by the Council does not demonstrate in a transparent way how all of the policy requirements within the Local Plan have been factored into the Viability Assessment

### Recommended Change

6.8 The Viability Assessment work undertaken by the Council needs to be updated to ensure that the detail of all of the required infrastructure contributions is dealt with on an item by item basis to provide sufficient detail of all of the likely infrastructure contributions required. This information also needs to be included in the IDP.

## 7.0 **Policy ENV7 – Renewable and Low Carbon Energy Development**

### Introduction

- 7.1 Policy ENV7 sets out the approach and guidance on how development should respond to energy issues across the Borough.

### Consideration of Policy

- 7.2 Part 6 of Policy ENv7 requires the following:

*In the strategic housing and employment allocations as defined in Policies MD1 to MD4 and OS1 to OS9 and identified on the Key Diagram/Polices Map the Council will seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems that would use or generate renewable or other forms of low carbon energy. In these locations all development will be required to establish, or connect to an existing, decentralised energy network unless this is shown not to be feasible or viable, in which case development will be required to;*

*a. make provision to enable future connectivity in terms of site layout, heating design and site-wide infrastructure design; and*

*b. to ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy source(s).*

- 7.3 Story is concerned that the cost of providing such infrastructure has not been factored into the Viability Assessment and the implications of its provision cannot therefore be properly assessed.

### Tests of Soundness

- 7.4 Story Homes is concerned that Part 41 of Policy MD3 would fail the tests of soundness because:

- 1 It is not justified: From the Local Plan Viability Assessment, it is not clear whether the costs of providing such infrastructure have been factored into the viability appraisals undertaken.

### Recommended Change

- 7.5 **The Council's** evidence needs to demonstrate, in a transparent way, how the requirement for establishment or connection to decentralised energy systems in Policy ENV7 has been factored into the Viability Assessment.

## 8.0 **Section 10 – Site Allocations**

### Introduction

- 8.1 Section 10 of the Local Plan identifies the main development areas and site allocations to help meet the housing requirement over the plan period. In relation to allocations proposed around Lymm, Story Homes objects to Section 10 of the Local Plan as currently proposed, as the plan fails to allocate land at Reddish Lane and Rushgreen Road in Lymm for residential development.

### Land at Reddish Lane, Lymm

- 8.2 The Reddish Lane site comprises approximately 7 hectares of undeveloped farmland. It adjoins the north eastern edge of the settlement of Lymm, approximately 300m north of the village centre. The Site comprises two arable fields, separated by Reddish Lane which is accessed from Rushgreen Road.
- 8.3 The site can accommodate up to 165 high quality family homes comprising a range of 2, 3, 4 and 5 bed homes with associated open space.
- 8.4 A plan showing the land being promoted by Story is attached at Appendix 3. A Vision Document relating to this site accompanies these representations.

### Land at Rushgreen Road

- 8.5 In addition to promoting the aforementioned land at Reddish Lane, Lymm, Story Homes are also submitting representations in respect of additional land at Rushgreen Road for allocation. This site is identified as land edged blue on the location plan at Appendix 4. This site measures approximately 1.12ha and has the potential to accommodate approximately 20 additional dwellings.
- 8.6 This land lies adjacent to and is contiguous with the Reddish Lane site and could be delivered as part of a comprehensive development with the proposed allocation at Reddish Lane with appropriate pedestrian and ecological connectivity. It is envisaged that the existing dwellings and landscaping in the southern part of the site would be retained and the northern part used to accommodate residential development and a potential access from Rushgreen Road if required.
- 8.7 Both sites are considered to be fully deliverable as they are available now, offer a suitable location for development now, and are achievable. The sites are highly sustainable due to their relationship with the existing services and facilities in the area. An assessment of the technical and environmental constraints that could prevent or restrict the development of the land has been undertaken and it is considered that there are no overriding technical or environmental constraints that would prevent it from coming forward for housing development.

### Deliverability

- 8.8 The Framework [Annex 2] states that for housing sites to be considered deliverable, they should be available now, offer a suitable location for development now, and be achievable, with a realistic prospect that housing will be delivered on the site within five years.
- 8.9 The land is available for the delivery of housing now. Story Homes has an agreement with the landowner at Reddish Lane, Lymm and are in detailed discussions with the landowners of Rushgreen Road, Lymm, to bring the land forward for residential development (subject to their release from the Green Belt). There are no legal or ownership constraints to their delivery.

- 8.10 An assessment of the technical and environmental constraints that could prevent or restrict the development of the land has been undertaken and it has identified that there are no overriding technical or environmental constraints that would prevent it from coming forward for housing development.
- 8.11 The land is located in a strong market area which experiences high demand for new homes and there are no overriding constraints which present an obstacle to delivery. Story Homes is committed to progressing a scheme as soon as the site is allocated. The land is therefore achievable and viable for residential development.
- 8.12 The land offers a suitable location for housing and can be developed in the first 5 years. The land is therefore fully deliverable.

## Sustainable Development

- 8.13 National policy seeks to ensure new developments are located in areas which limit the need to travel and offer a genuine choice of transport modes. The site is highly sustainable due to its relationship with the existing services and facilities in the area. The land lies within an area which benefits from being in close proximity to a range of local schools, services and facilities, together with employment opportunities.
- 8.14 The land is within a 5 minute walk of a foodstore and within a 10 minute walk of facilities in and around Lymm Village Centre including a GP surgery, dentist, pharmacies, a foodstore, a library, a pre-school, and two churches. Other services in Lymm Village centre include a post office, a bakery and various restaurants and public houses.
- 8.15 A number of primary and secondary schools are within walking distance of the site. Ravenbank Primary School is located on Pepper Street approximately 850m from the site. Less than 15 minutes walk (approximately 1,100m) from the site is Oughtrington Community Primary School on Howard Avenue. Cherry Tree Primary School is located approximately 1,500m from the site on Hardy Road. Secondary education facilities are provided at Lymm High School which is located approximately 2km from the site on Oughtrington Lane.
- 8.16 The land is also well served by public transport facilities. There are bus stops on Rush Green Road within a 5 minute walk of the site with services Cat5 and Cat5a providing half hourly services between Altrincham and Warrington Bus Interchange.
- 8.17 The development of the land for housing will bring a number of benefits in line with the principles of sustainable development. The future development of the site will have positive economic, social and environmental benefits and therefore constitutes sustainable development in accordance with the NPPF [para. 8].

## Economic Benefits

- 8.18 The development of the land will contribute towards building a strong, responsive and competitive economy within Warrington. The delivery of high-quality housing on the site will contribute to ensuring that population growth within Warrington is focused in an area close to employment opportunities, which can be easily accessed via a sustainable transport network. The land will allow new working age families to settle in Lymm which will help to ensure a resident labour force in the area that is capable of supporting sustainable economic growth which will not result in large increases in in-commuting from elsewhere in the region. The development of the land will bring a number of benefits including: additional Council Tax revenues and direct and indirect/induced job creation. Benefits from the construction of the land include the creation of jobs for the local economy where possible and the use of local

construction firms and suppliers. Additional residents will also generate more spending power in the local area to enhance the vitality of local services.

### Social Benefits

- 8.19 The development of the land will support the creation of a strong, vibrant and healthy community by increasing the supply of housing in a sustainable location. The proposed development will comprise a high-quality built environment and will be designed to meet the needs of the area and complement the character of the surroundings. New homes will meet local needs and attract and welcome new families to the area and affordable housing to meet the identified needs of local residents. Public open space and recreation space, including play areas for children, would be available for use by both existing and future residents.

### Environmental Benefits

- 8.20 The development provides the opportunity to deliver a number of benefits including: access to public transport facilities and existing shops, services and facilities within walking distance of the site; pedestrian and cycle routes; new green infrastructure including green corridors and open space; and, a design which is informed by the existing landscape and incorporates and protects existing features.
- 8.21 No environmental constraints have been identified that would inhibit the future allocation and development of the land.

### Green Belt

- 8.22 Story Homes agrees that an exceptional circumstances case has been demonstrated for the release of Green Belt land including the outlying settlements. However, Story has a number of concerns with the assessment of the Reddish Lane site and considers that the site should be released from the Green Belt. Further detail on this matter is set out in our response to Policy GB1 – Green Belt.

### Proposed allocations in Lymm

- 8.23 Having reviewed the allocations identified in Lymm in the Local Plan, Story Homes considers that the Reddish Lane and Rushgreen Road sites comprises more sustainable sites when compared to these sites for the following reasons:
- 1 The Reddish Lane and Rushgreen Road sites make no greater contribution to the purposes of the Green Belt than the sites identified, apart from Pool Lane, Lymm.
  - 2 The draft allocations at Massey Brook Lane (OS5), Pool Lane (OS6), and Warrington Road (OS8) are all located on the western boundary of the existing settlement. They are located a significantly greater distance from the shops and services in Lymm Village Centre than the Reddish Lane site which is likely to encourage more use of the private car given the distances involved.
  - 3 The Local Plan and evidence base suggests that some of the draft allocations are subject to constraints which may limit their development potential. For example, the Pool Lane site is identified in the Development Options and Site Assessment Technical Report<sup>5</sup> as lying within Flood Zone 2. Story notes that approximately half of the Warrington Road site is also located within Flood Zone 2. The Practice Guidance<sup>6</sup> on flood risk and coastal change advises that the aim is to steer new development to Flood Zone 1 and only consider Zone 2

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<sup>5</sup> Development Options and Site Assessment Technical Report 2019, SHLAA Ref: 1622

<sup>6</sup> Reference ID: 7-019-20140306

sites where there are no reasonably available sites in Flood Zone 1. The Reddish Lane site is located in Flood Zone 1.

- 4 The draft policies for the Pool Lane and Warrington Road sites require the design of development to mitigate noise impacts from the adjacent Statham Lodge Hotel. It could therefore be the case that the development potential of these sites is affected as a result of the mitigation required (e.g. appropriate stand-off distances, acoustic fencing or bunding etc.). The location of residential development on these sites may also place operational limits on the hotel site, in order to ensure residential amenity, which could have a detrimental impact upon the hotel operation. The draft policies for the Pool Lane and Warrington Road sites also require a screening buffer to the Statham Lodge Hotel site and a potential restriction on heights of development within the setting which would again have an impact upon the development potential of the sites.
- 5 Story also notes that the draft allocations at Massey Brook Lane (OS5), Pool Lane (OS6), and Warrington Road (OS8) are all located in close proximity to the M6 motorway which will be a significant generator of noise (approximately 300m in the case of the Warrington Road site). The motorway is elevated in this location in order to pass over local roads and the Bridgewater Canal which is likely to exacerbate this issue. It is not clear from the **Council's Development Options and Site Assessment Technical Report or the Sustainability Appraisal** whether the potential impacts of noise from the motorway upon development in these areas has been considered. Story considers that this matter needs to be investigated and notes that any mitigation required could have an impact upon the development potential of these sites.
- 6 The Development Options Report also notes that there are suitability issues with the Warrington Road site as it contains a locally important site not suitable for biodiversity offsetting and it is adjacent to an area of potentially contaminated land to the north east.
- 7 With regard to the draft allocation at Rushgreen Road/Tanyard Farm (OS7), Story notes that the eastern part of this site (approximately 4.4ha) has planning permission for 64 dwellings with an ecological enhancement area, landscaping, open space, and access, which was granted at appeal in September 2018 (PINS Ref: APP/M0655/W/18/3200416). If the appeal scheme is built out this would involve the provision of at least 136 dwellings on the remainder of the allocation (which is similar in size to the appeal site). Draft Policy OS7 also requires the provision of a 1,500 sq m health care facility which along with associated parking, landscaping etc. will reduce the development potential of the remaining land for housing. Story therefore considers that it is uncertain whether 136 homes could be achieved on the remainder of the allocation and further sites should be identified to help meet any shortfall.

8.24 For the above reasons it is considered that alternative sites around Lymm should be identified **for allocation**. **Story's site at Reddish Lane** is considered to be appropriate for this purpose.

## Approach to Safeguarded Land

8.25 Story notes that the Local Plan does not propose the identification of any safeguarded land to meet needs beyond the plan period. The Framework [§139] advises that, where necessary, plans should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period and be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the period. For the reasons set out in these representations, Story is concerned that the **Council's approach** fails to demonstrate that Green Belt boundaries will not need to be altered. It therefore considers that the Local Plan should identify safeguarded land around the main urban area and outlying settlements. For the reasons set out in these representations, Story Homes consider that the

Reddish Lane and Rushgreen Road sites should be released from the Green Belt and allocated for residential development. However, should the Council determine that allocation or **identification as a 'Plan B' site is not suitable, it is considered that the sites** should be identified as safeguarded land.

## Conclusion

- 8.26 The information submitted with these representations demonstrates that the Reddish Lane and Rushgreen Road sites:
- 1 Are in a highly sustainable location in close proximity to the existing services and facilities within the village centre;
  - 2 Make a moderate and weak contribution to the key purposes of the Green Belt and are therefore suitable for release given the lack of more suitable land for release;
  - 3 Provide an opportunity to create a high quality development which is sympathetic and responsive to the existing settlement character of Lymm; and,
  - 4 Would provide a more suitable location for residential development around Lymm than some of the draft allocations identified in the Local Plan.
- 8.27 There are no physical constraints or other potential impacts or environmental conditions which could preclude the development of the sites for housing.

## Tests of Soundness

- 8.28 Section 10 of the Local Plan is considered to fail the tests of soundness for the following reasons:
- 1 It is not justified: The sites are located in a more sustainable location than a number of the draft allocations around Lymm, and subject to less constraints than some of these sites and therefore a more reasonable alternative for development.
  - 2 It is not consistent with national policy: The omission of the Reddish Lane site and Rusghgreen Road site as a residential allocation will preclude the delivery of sustainable development contrary to the policies in the Framework.

## Recommended Change

- 8.29 To address the conflict above and ensure the Policy is sound, it is requested that the Council:
- 1 Updates the Green Belt Study to remove land at Reddish Lane and Rushgreen Road in Lymm from the Green Belt and allocate the sites for residential development.
  - 2 Should the Council still consider that the sites are unsuitable for allocation at the current time, the sites should be identified **as a 'Plan B' site** which is capable of coming forwards for development over the Plan period should a shortfall in housing land supply be established.
  - 3 **Should the Council determine that allocation or identification as a 'Plan B' site is not suitable, it is considered that the sites should be identified as safeguarded land to help meet development needs beyond the Plan Period.**



# Appendix 1 **West Lancashire Local Plan Policy RS6**

## Chapter 7 Providing for Housing and Residential Accommodation

**7.59** Although so-called temporary accommodation will not require planning permission, in most cases permission will be required. Operators should always check with the Council's Planning Department, but normally planning permission is required in the following circumstances:

- if the work will be held for longer than a normal planting, growing, or picking season;
- if conventional detached buildings (e.g. caravans and trailers) are to be kept on site permanently;
- if changing of use to an existing building is involved; or
- if the following and permanent services (e.g. water supply or septic tank) need to be constructed.

**7.60** The Council wishes to assist in supporting a healthy rural economy within the context of national and local planning policies. Permanent buildings or caravans which are kept on site for a number of months can reduce the open character of the Green Belt and have a negative impact on the landscape and the amenity of local residents. Therefore, the above policy has been introduced to limit the impact of this type of development on the local area.

**7.61** The Council has also produced Supplementary Planning Guidance on Accommodation for Temporary Agricultural Workers, which is relevant to the implementation of this policy.

### Other Local Planning Policy and supporting documents

- Accommodation for Temporary Agricultural Workers SPG (2007)

## 7.6 Policy RS6: A "Plan B" for Housing Delivery in the Local Plan

### Context

**7.62** Policy GN2 sets out several sites across the Borough that are designated for development for the needs of a "Plan B", should it be required. Appendix E sets out the key issues in relation to delivery and risk for each individual policy. For Policies SP1 and RS1, the delivery issues often revolve around a similar concern – what if a key site or location for residential development cannot be delivered? Ultimately, this is the overall outcome of the locally-derived target for residential development not being met, unless a viable alternative can be found.

**7.63** Therefore, whilst it is hoped that all aspects of the Local Plan will be deliverable, and the above provisions included because the Council believes that they are, it is prudent to have a "Plan B" prepared in case a key site (s) for residential development does not come forward during the plan period. Policy RS6 provides the Council with the ability to monitor whether "Plan B" should be considered through monitoring that the Local Plan's residential target is not being met.

**7.64** An additional consideration is the fact that the Local Plan covers a long period (15 years) and, in relation to the locally-derived target, it is not unreasonable to expect to change in the medium term for those targets over the 15 years, potentially resulting in new targets. Therefore, the Local Plan should be flexible enough to deal with change, which will involve some changes in circumstances, without a wholesale review of the Plan.

### Policy RS6

#### A "Plan B" for Housing Delivery in the Local Plan

The "Plan B" sites safeguarded in Policy GN2 will only be considered for release for housing development if one of the following triggers is met:

- Year 5 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 5 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- Year 10 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 10 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- The housing target increasing as a result of new evidence

If, at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from that safeguarded from development for "Plan B" to make up the extra land supply required to meet the new housing target for the remainder of the Plan period.

### Justification

**7.65** The Council believe that the locally-determined targets that have been set in this Local Plan are fair and reasonable in light of all the available evidence at this time. However, it is possible that targets for residential development will rise, meaning that new locations for development would need to be identified, and so in this situation the "Plan B" would also provide the flexibility required to accommodate this rise.

**7.66** In essence, the Council's "Plan B" for the Local Plan involves the release of land from the Green Belt and its allocation as safeguarded land under Policy GN2. This land would be safeguarded from development until the above triggers in Policy RS6 are reached. Until these triggers are reached the land will be protected from development in a similar way to Green Belt (see Policy GN2) and in such a way as to not prejudice the possible future development of this land if the "Plan B" is triggered.

## Chapter 7 Providing for Housing and Residential Accommodation

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**7.67** The supply of land safeguarded for development under the “Plan B” in Policy GN2 (which has a total capacity of 83 dwellings) is more than sufficient to allow for at least 15% extra to provide the 15-year housing target being proposed in the Local Plan (15% of 4,860 dwellings = 729 dwellings). This percentage is based on the assurance that even the largest of the housing allocations in the Local Plan is covered by the flexibility of the “Plan B”, should it fail to be delivered.

**7.68** Ongoing monitoring of housing delivery in the Plan period will enable the Council to be prepared for a trigger point in Policy RS6 being reached. If it is anticipated that a housing trigger point is reached (i.e. at the end of Years 4 and 9 of the Plan) that housing delivery is at risk of triggering the “Plan B”, the Council will commence a review of the level of affordable housing supply compared to housing requirements. This review will also review the “Plan B” sites themselves in order to identify which site(s) are most suitable to release for development at that time (i.e. depending on the nature, area, size, and the housing supply), should the level of affordable housing supply ultimately trigger the “Plan B” in April of the following year. The quantum of release will be sufficient to meet the identified shortfall in housing delivery compared to the housing requirements.

## Appendix 2 **Green Belt Comparison Table**

## Lymm, Reddish Lane – Green Belt Contribution Comparison table

Site	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
<b>R18/082</b>	<b>No contribution:</b> The site is not adjacent to the Warrington urban area and therefore does not contribute to checking the unrestricted sprawl of large built-up areas.	<b>No contribution:</b> The site does not play a role in preventing towns from merging.	<b>Strong contribution:</b> The site is connected to the settlement along its western and southern boundaries. The western boundary consists of hedge lined garden boundaries which may not be durable enough to prevent encroachment into the site. The southern boundary consists of the A6144 Rush Green Road, which is more durable. The site is connected to the countryside along its northern and eastern boundaries. Part of the northern boundary consists of the Transpennine Trail, which is durable, but the majority of the site's northern and eastern boundary consists of non-durable field boundaries which are not durable however the durable Transpennine Trail is within 100m of the boundary and this would contain any encroachment. The existing land use consists of open countryside. There is no built form and low levels of vegetation, mainly consisting of trees along Reddish Lane within the site. The site is well connected to the open countryside to the north. The site supports a strong degree of openness as it contains no built form, low levels of vegetation and supports long line views of the countryside to the north. Overall the site makes a strong contribution to safeguarding the countryside from encroachment due to its openness and non-durable boundaries to the west and east.	<b>Strong contribution:</b> Lymm is a historic town. The site does not cross an important viewpoint of the Parish Church. The majority of the site is located within the 250m buffer area around Lymm Conservation Area. Part of the site's southern boundary lies adjacent to the Conservation Area. Therefore the site makes a strong contribution to preserving the setting and special character of historic towns.	<b>Moderate contribution:</b> 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.	The site makes a strong contribution to two purposes, a moderate contribution to one and no contribution to two. In line with the methodology, the site has been judged to make a strong overall contribution. While the site does not contribute to checking unrestricted sprawl or preventing towns from merging, it makes a strong contribution to preserving the character of the Lymm Conservation Area and safeguarding the countryside from encroachment due to its location, openness and non-durable boundaries. The site also makes a moderate contribution to assisting in urban regeneration.	<b>Strong contribution</b>
<b>Story Homes' view</b>	<b>Agree - No contribution</b>	<b>Agree - No contribution</b>	<b>Strongly Disagree - Moderate Contribution</b> Story Homes disagree with the Council's Assessment of purpose 3 whereby the proximity of the site's northern boundary to the Trans Pennine Trail has been given only limited weight in the assessment methodology. The Council acknowledge that the Trans Pennine Trail is a durable boundary that would "contain any encroachment" and therefore the contribution of the parcel to purpose 3 should be downgraded. In addition to this, we also disagree that the site supports a "strong degree of openness" as although it is connected to the open countryside to the north, the views from the site and visual openness beyond its northern boundary are restricted by the elevated position of the Trans Pennine Trail with it being a former railway line. Although not in use, the railway line does perform an urbanising feature in the landscape given that the line was engineered to accommodate the former Manchester to Warrington line. Overall we disagree that the site makes a 'strong contribution to safeguarding the countryside from encroachment' as the site sit's within a durable boundary to the north and is a natural infill to the existing residential development to the western and southern boundaries. There are also residential properties to the east of the site thus providing urbanising features on all boundaries of the site.	<b>Disagree – Moderate contribution</b> Story Homes agree that Lymm is a historic town and acknowledge that the site's southern boundary is adjacent to the Lymm Conservation Area. Heritage consultants Wardell Armstrong have undertaken a heritage assessment of the site to assess what impact the proposed development would have on designated and non-designated heritage assets within the vicinity of the site. The assessment concludes, following guidance by Historic England that the evidential, historical and aesthetic values of Lymm conservation area will be unaffected by development within the site. Similarly the setting of the conservation area will be unaffected through the proposed development. Story Homes have previously submitted this evidence to the Council in December 2016.	<b>Agree – Moderate contribution</b>	The site makes a moderate contribution to two purposes of the green belt in addition to three weak contributions.  The site represents a logical location for release which will have relatively limited harm to the general extent of the Warrington Green Belt. The surrounding features are easily recognisable and can form new defensible boundaries. Although the site's northern boundary is not regarded as 'durable', it is within very close proximity to the Trans Pennine Trail and therefore when assessed as a wider Green Belt parcel in this location, the Trans Pennine Trail is a significant urbanised boundary that prevents urban sprawl and encroachment into the wider countryside.	<b>Moderate contribution</b>

## Appendix 3 **Land at Reddish Lane, Lymm**



Mersey Path

Bollin Dr  
Bollin Close

Reddish Crescent

Dyers Ln

Rush Green Rd

Rush Green Rd

A614

Fletchers Way

Grasmere Rd

Marsdale Crescent

Stamford Ct

New Rd

Canal Bank

Dane Bank Rd E

The Square

Quayside Mews

Cyril Bell Close

Ra

Brooklyn Dr

Lymm Ln

Bank Rd

Millbank



## Appendix 4 **Additional Land at Rushgreen Road**



Mersey Path

Bollin Dr  
Bollin Close

Reddish Crescent

Dyers Ln

Rush Green Rd

Rush Green Rd

A614

Fleethers Ln

Grasmere Rd

Marsdale Crescent

Stamford Ct

Dane Bank Rd E

Dane Bank Rd

New Rd

Canal Bank

Quayside Mews

Cyril Bell Close

The Square

Millbank

Brooklyn Dr

Lymm Hall Ln



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# REDDISH LANE, LYMM

VISION DOCUMENT, SEPTEMBER 2017







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PAGE 25	09 CONCLUSION



wardell  
armstrong

c.rof±  
Transport Solutions

# 01 INTRODUCTION



This Vision Document has been prepared by Story Homes North West to set out the vision for a new sustainable extension to Lymm, in Warrington. It sets out the case for releasing land at Reddish Lane ('the Site') from the Green Belt and allocating it for housing, as part of Warrington Borough Council's Local Plan Review. It demonstrates that this can provide a sustainable solution to help Warrington Borough Council meet its future housing growth requirements.

To ensure the appropriate development of the Site, Story Homes has instructed a development team with a proven track record in delivering successful schemes. This includes WYG (Planning, Landscape and Visual Impact) Astle Planning and Design (Design), Croft Transport Solutions (Highways) and Wardell Armstrong (Heritage).

This document has taken account of key technical considerations including accessibility, landscape and visual impact to inform the preparation of a Concept Masterplan that demonstrates the suitability of the Site for residential development.

At the outset, it is highlighted that the site:

- Is in a highly sustainable location in close proximity to the existing services and facilities within the village centre
- Will result in a relatively minimal harm to the key purposes of the Green Belt; and
- Provides an opportunity to create a high quality development which is sympathetic and responsive to the existing settlement character of Lymm

This document is submitted to the Council alongside the representations to the Warrington Local Plan Preferred Option consultation (September 2017) produced by WYG, and builds on the earlier scoping stage consultation and the Heritage Appraisal produced by Wardell Armstrong. Both of these representations should be read in conjunction with this Vision Document.





# INTRODUCTION TO STORY HOMES



Story Homes is a privately owned housebuilder, founded by Fred Story in 1987. It has a long and successful reputation of building quality and high specification homes across the North of England and South of Scotland. The family owned business has grown in size and status over the years but remains grounded, built on its original ethos of 'doing the right thing' and creating a brand synonymous with quality.

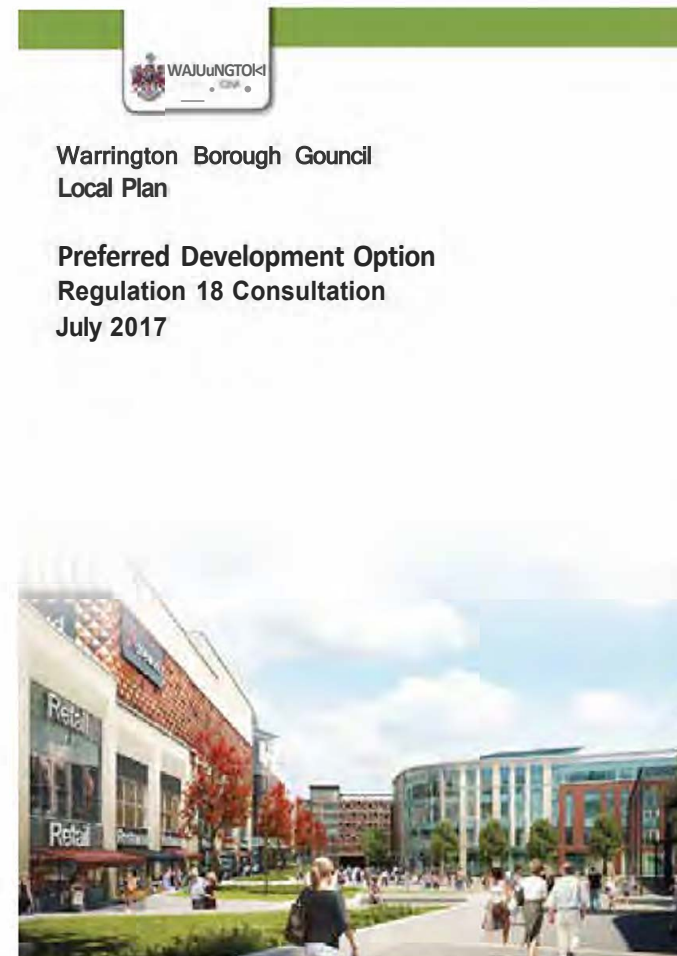
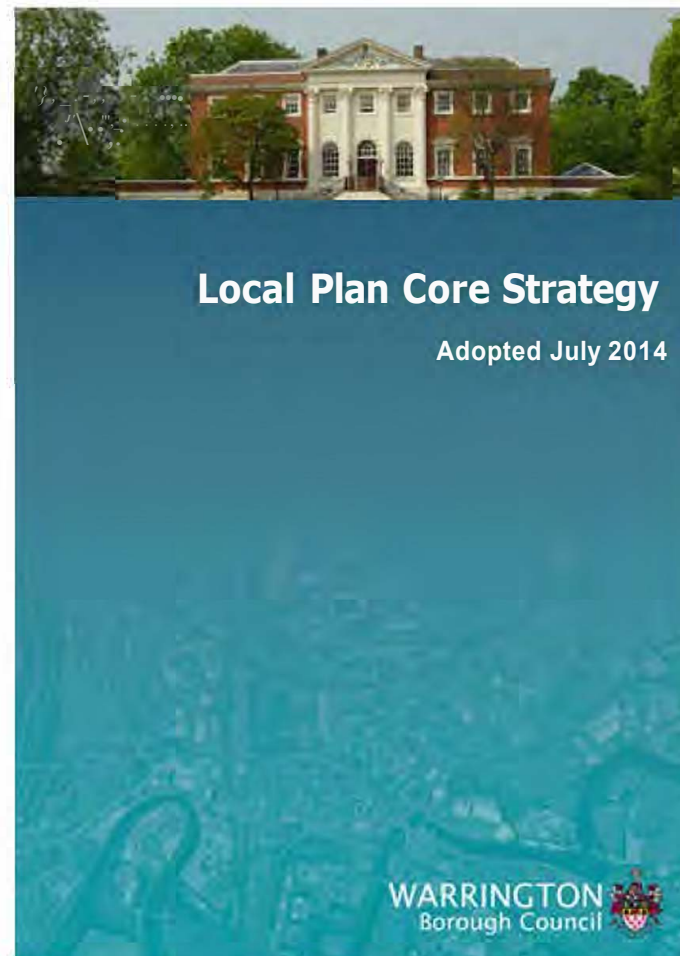
For nearly 30 years Story Homes has been the name most often associated with aspirational homes for sale throughout Cumbria, the North East and Lancashire. A passion for quality and excellence has seen Story Homes become a multi-award winning UK property developer; with modern and attractive homes instantly inspiring buyers. Story Homes have been awarded the top '5 star' rating in the house building industry's annual customer satisfaction survey for the 4th year running since becoming eligible 4 years ago.

Story Homes' success is underpinned by a determination to understand the needs of communities where we build and a goal to deliver design quality and high quality building specifications that enhance locations. Story Homes' presence in the North West is growing significantly and has recently been awarded 3 UK Property awards for Brookwood Park in Kirkham, The Woodlands in Shatley Bridge and Pentland Reach in Biggar.

The Story Difference - comprising a commitment to design quality, place-making and customer experience - will be instrumental in delivering an exemplary new development which Lymm can be proud of.

# 0 2 THE PLANNING CONTEXT

## THE EMERGING WARRINGTON LOCAL PLAN REVIEW



Given the results of the High Court challenge and the emerging evidence underpinning the Borough's growth needs and economic development ambitions, the Council recognised the need to undertake a review of the Local Plan.

Local Plan Scoping stage consultation was undertaken in November 2016. The Council then published their Preferred Development Option for consultation in July 2017. This sets out the current housing and employment land requirement for the Borough and the preferred option strategy for meeting these needs.

To underpin the Local Plan review, the Council commenced the preparation of the Borough's housing and economic needs to the year 2037. The most up to date study assessing the housing objectively assessed need (OAN) for the Borough identified a need of 955 new homes per year to 2037.

The Council has also assessed the number of additional jobs that will be created through the Council's growth aspirations set out in the 'Warrington Means Business' economic development programme as well as the Local Enterprise Partnership's (LEP) Strategic Economic Plan and future growth ambitions. These growth aspirations will deliver 31,000 new jobs in Warrington up to 2040 which is approximately 30% above the baseline forecasts and there is a need to ensure a balance between the number of homes and jobs.

There is also a need to provide an additional 5% buffer to allow for flexibility (as directed by the National Planning Policy Framework) and to make up for an existing backlog of 847 homes. All of this means that it will now be necessary to increase the minimum supply of homes to around **1,200 per annum**. The Council are also seeking to identify 'safeguarded land' to meet further needs for the ten years beyond the Plan period.

The most recent Strategic Housing Land Availability Assessment (SHLAA), published in January 2016 has identified that Warrington's housing needs cannot be met on brownfield land, existing commitments and on greenfield sites outside of the Green Belt.

If Warrington is to meet its development needs, then based on the Preferred Development Option, sufficient Green Belt land will need to be released to deliver approximately 9,000 new homes and 213 hectares of employment land over the next 20 years [from Preferred Development Option, WBC, July 2017].

Warrington Borough Council adopted its Local Plan Core Strategy in July 2014. This set out a need to build 500 new homes every year up to 2027. This requirement is now out of date.

Following the adoption of the Core Strategy, a High Court Challenge subsequently quashed the specific parts of the Plan relating to:

- The housing target of 10,500 new homes (equating to 500 per year) between 2006 and 2027 and;
- References to 1,100 new homes at the Omega Strategic Proposal

The Council have sought to deliver as much housing as possible within the urban area. They commissioned an Urban Capacity Study which estimated that 15,429 homes could be delivered on existing urban sites, a figure which we feel is unrealistically high and is open to challenge. However, the Council nevertheless maintain that they will need to release sufficient Green Belt land to deliver 8,791 homes (see Table 1).

The Preferred Development Option is Option 2. This is for the majority of Green Belt release to be adjacent to the main urban area in Warrington, with incremental growth in the outlying settlements. This includes a Garden City Suburb of approximately 6,000 new homes to the south-east of Warrington and an urban extension in South-West Warrington of around 2,000 homes.

The outlying settlements have been identified as having an indicative capacity for 1,190 new homes on land to be released from the Green Belt, of which 500 will be located in Lymm (see Table 22).

The Green Belt Assessment has assessed all suitable sites immediately adjacent to the existing built-up area of Lymm and there is only enough land identified as making a 'weak' contribution to the Green Belt to deliver around 45 houses. It will therefore be necessary to release land that makes a 'moderate' contribution to the Green Belt in Lymm. This corresponds with the 'incremental growth' option assessed in WBC's Settlement Profile for Lymm, which concludes that this level of growth is likely to be supported by existing and enhanced infrastructure within Lymm.

This represents very clear "exceptional circumstances" to justify the release of land from the Green Belt. The Site at Reddish Lane in Lymm has the potential to make a substantial contribution to the social and economic success of the Borough.

	955 p.a.	1,113 p.a.	1,332 p.a.
<b>Housing Target 2017 to 2037</b>	<b>19,100</b>	<b>22,260</b>	<b>26,640</b>
<b>Flexibility at 5%</b>	<b>955</b>	<b>1,113</b>	<b>1,332</b>
<b>Backlog (from 2015 against OAN)</b>	<b>847</b>	<b>847</b>	<b>847</b>
<b>Total Requirement</b>	<b>20,902</b>	<b>24,220</b>	<b>28,819</b>
<b>Total Capacity within urban area</b>	<b>15,429</b>	<b>15,429</b>	<b>15,429</b>
<b>Green Belt requirement</b>	<b>5,473</b>	<b>8,791</b>	<b>13,390</b>

**Table 1: Housing Land Requirements**

Settlement	Indicative Green Belt Capacity
Lymm	500
Culcheth	300
Burtonwood	150
Winwick	90
Croft	60
Glazebury	50
Hollini, Green	40
<b>TOTAL</b>	<b>1,190</b>

**Table 22: Outlying Settlements - Indicative Green Belt Capacity**

Tables extracted from Preferred Development Option, WBC, July 2017

# 03 THE SITE

## LOCATION AND OWNERSHIP



The Site is comprised of approximately 7 hectares of undeveloped farmland. It adjoins the north eastern edge of the settlement of Lymm, approximately 300m north of the village centre. The Site comprises two arable fields, separated by Reddish Lane which is accessed from Rushgreen Road.

The Site is in single ownership and Story Homes has an agreement with the landowner. It is therefore under the control of a single housebuilder. There are no ownership or other legal constraints to its development.

The Site is enclosed by:

- The residential areas of Lymm to the west and south
- A6144 Rushgreen Road to the south
- Trans Pennine Trail (the former London and North Western Railway line opened in 1853) to the north
- A further field to the east currently being promoted for residential development

The Site is in a highly sustainable location in very close proximity to existing services and facilities, and will result in relatively minimal harm to the Green Belt.

The Site is broadly flat, with various trees and hedgerows characterising the boundaries of the site adding to the degree of self containment within the landscape. The Site is locally very well contained by the former railway line and associated vegetation to the north, and residential development to the east, west and south. A further open field lies beyond the site boundary to the east between the site and housing on Reddish Crescent which in turn runs into Reddish Lane where it crosses the former railway line to access New Farm and Reddish Hall beyond the line to the north.

# 04 GREEN BELT ASSESSMENT

Warrington Borough Council have undertaken two Green Belt Assessments, one in October 2016 and an additional assessment in July 2017, which assessed sites submitted to the Council.

In the October 2016 Assessment, the Reddish Lane site in Lymm was identified as parcels LY8 and LY9, which were considered to have a strong (LY8) and 'moderate' (LY9) contribution respectively.

The July 2017 Assessment references the site as R18/082 (SHLAA reference), which now considers parcels LY8 and LY9 as making a 'strong' contribution. Story Homes have provided a comparative assessment overleaf against this July 2017 Assessment.

A significant amount of work has already been done by GL Hearn in Story's Stage 1 representation regarding our assessment of the Green Belt contribution for this land.

Instead of assessing the value of the parcel land in its current situation the assessment should properly consider the impacts of releasing and developing the parcels. If parcels LY8 and LY9 (R18/082) are developed then the only boundary to the countryside from this part of the settlement edge will be their northern boundaries, which we consider to be strong. The impact of development will therefore be to create a stronger, more defensible settlement edge, which will therefore better safeguard the adjoining countryside from encroachment. We therefore consider the assessment for both these sites should be 'moderate' contribution and not 'strong'.

## 1994 Local Plan

This view is supported by the Council's position on this land in preparing the 1994 Local Plan, when the Council originally intended not to include this site within the Green Belt, and by the Inspector's Report, in which he stated:

"...If development were eventually to be permitted here it would be well contained by the northern boundary feature and would not represent encroachment into open countryside. The Council's decision not to designate the Reddish Lane land as part of the proposed Green Belt is entirely justified."

[Inspector's Report, 1994 Local Plan]

The impacts of this change will mean that LY8 will have two purposes as making 'no contribution', two 'moderate' contributions and one 'strong' contribution. This should therefore make the overall assessment of LY8 as 'moderate' rather than 'strong'.



Although parcels LY8 and LY9 lie alongside the edge of the Conservation Area, we believe that the development can respond positively to the conservation area through good design and an appropriate site layout, landscape strategy.

Parcel LY9 is already considered as making a 'moderate' contribution and following the re-assessment suggested above would remain as 'moderate'.

In total, the Green Belt land around Lymm has been separated into 29 parcels. Seven of these have been assessed as making a 'strong' contribution, 19 as being 'moderate' and three as being 'weak'. However, the three 'weak' land parcels represent a small area of land and only a small part of one of these parcels has been promoted within the Call for Sites exercise summarised in the 2015 SHLAA (SHLAA reference R18/036). This amounts to just 45 houses. It can therefore be reasonably concluded that for Lymm to meet its housing needs some of the 'moderate' parcels will need to be released from the Green Belt.



# GREEN BELT ASSESSMENT

Lymm, Reddish Lane - Green Belt Contribution Comparison table							
Site	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	overall Assessment
	<b>No contribution:</b> The site is not adjacent to the Warrington urban area and therefore does not contribute to checking the unrestricted sprawl of large built-up areas.	<b>No contribution:</b> The site does not play a role in preventing towns from merging.	<b>strong contribution:</b> The site is connected to the settlement along its western and southern boundaries. The western boundary consists of hedge lined garden boundaries which may not be durable enough to prevent encroachment into the site. The southern boundary consists of the A6144 Rush Green Road, which is more durable. The site is connected to the countryside along its northern and eastern boundaries. Part of the northern boundary consists of the Transpennine Trail, which is durable, but the majority of the site's northern and eastern boundary consists of non-durable field boundaries which are not durable however the durable Transpennine Trail is within 100m of the boundary and this would contain any encroachment. The existing land use consists of open countryside. There is no built form and low levels of vegetation, mainly consisting of trees along Reddish Lane within the site. The site is well connected to the open countryside to the north. The site supports a strong degree of openness as it contains no built form, low levels of vegetation and supports long line views of the countryside to the north. Overall the site makes a strong contribution to safeguarding the countryside from encroachment due to its openness and non-durable boundaries to the west and east.	<b>Strong contribution:</b> Lymm is a historic town. The site does not cross an important viewpoint of the Parish Church. The majority of the site is located within the 250m buffer area around Lymm Conservation Area. Part of the site's southern boundary lies adjacent to the Conservation Area. Therefore the site makes a strong contribution to preserving the setting and special character of historic towns.	<b>Moderate contribution:</b> 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.	The site makes a strong contribution to two purposes, a moderate contribution to one and no contribution to two. In line with the methodology, the site has been judged to make a strong overall contribution. While the site does not contribute to checking unrestricted sprawl or preventing towns from merging, it makes a strong contribution to preserving the character of the Lymm Conservation Area and safeguarding the countryside from encroachment due to its location, openness and non-durable boundaries. The site also makes a moderate contribution to assisting in urban regeneration.	
	<b>Agree- No contribution</b>	<b>Agree- No contribution</b>	<b>Strongly Disagree - Moderate Contribution</b> Story Homes disagree with the Council's Assessment of purpose 3 whereby the proximity of the site's northern boundary to the Trans Pennine Trail has been given only limited weight in the assessment methodology. The Council acknowledge that the Trans Pennine Trail is a durable boundary that would "contain any encroachment" and therefore the contribution of the parcel to purpose 3 should be downgraded. In addition to this, we also disagree that the site supports a "strong degree of openness" as although it is connected to the open countryside to the north, the views from the site and visual openness beyond its northern boundary are restricted by the elevated position of the Trans Pennine Trail with it being a former railway line. Although not in use, the railway line does perform an urbanising feature in the landscape given that the line was engineered to accommodate the former Manchester to Warrington line. Overall we disagree that the site makes a 'strong contribution to safeguarding the countryside from encroachment' as the site sit's within a durable boundary to the north and is a natural infill to the existing residential development to the western and southern boundaries. There are also residential properties to the east of the site thus providing urbanising features on all boundaries of the site.	<b>Disagree - Moderate contribution</b> Story Homes agree that Lymm is a historic town and acknowledge that the site's southern boundary is adjacent to the Lymm Conservation Area. Heritage consultants Wardell Armstrong have undertaken a heritage assessment of the site to assess what impact the proposed development would have on designated and non-designated heritage assets within the vicinity of the site. The assessment concludes, following guidance by Historic England that the evidential, historical and aesthetic values of Lymm conservation area will be unaffected by development within the site. Similarly the setting of the conservation area will be unaffected through the proposed development. Story Homes have previously submitted this evidence to the Council in December 2016.	<b>Agree - Moderate contribution</b>	The site makes a moderate contribution to two purposes of the green belt in addition to three weak contributions.  The site represents a logical location for release which will have relatively limited harm to the general extent of the Warrington Green Belt. The surrounding features are easily recognisable and can form new defensible boundaries. Although the site's northern boundary is not regarded as 'durable', it is within very close proximity to the Trans Pennine Trail and therefore when assessed as a wider Green Belt parcel in this location, the Trans Pennine Trail is a significant urbanised boundary that prevents urban sprawl and encroachment into the wider countryside.	



# 05 SUSTAINABILITY

## Local Facilities

We have undertaken analysis of the location of key community facilities in Lymm and their accessibility from the subject site (see the Facilities Plan).

This analysis shows that most of the key local facilities are located within 10 minutes' walk of the site. This includes two GP surgeries, and a food store within 5 minutes' walk of the site. Other local facilities, including a high school and a choice of primary schools, are available in the village. This makes the site sustainable: there will be not be a reliance on the private car and most journeys can be done on foot.

Reddish Lane has regular bus services, with two stops available within 5 minutes' walk of the Site, at the Site's southern boundary. Service no.5 offers half hourly buses to Altrincham and Warrington.

The Site compares favourably with other sites put forward in the Call for Sites exercise in terms of accessibility to shops and services. It is the closest of the sites to the village centre. Most of the other sites put forward are at the furthest edges of the settlement and located much further away from local facilities.

## Education

Several primary schools and a secondary school are all within walking distance of the Site. Oughtrington Primary School is located around 1,100 metres, just over a 14 minute walk, from the Site off Howard Avenue. Access to the school can be achieved directly utilising the existing footways along Rush Green Road and Howard Avenue.

Footways exist along both sides of Rush Green Road, to the east of the site, as does a formal signal controlled pedestrian crossing point across the carriageway close to the junction with Howard Avenue which links the Site to the school.

The nearest secondary school to the Site is Lymm High School around 2 kilometres from the Site.

The Site is in a highly sustainable location. Many local amenities are situated within a short walk of the Site and would provide day-to-day services and facilities for the new residents.

## Medical

The nearest medical facilities are located around 800 metres from the Site at the Brookfield Surgery on Brookfield Road located to the west of the Site. Several dental surgeries are located close to the site, the closest being Jill Cooper Dental Surgery on Rush Green Road around 500 metres east of the Site.

Altrincham and Warrington Hospitals are both within a short bus journey of the Site using either the service number 5 or the 38 both of which pass the site on Rush Green Road.

## Retail

There are local retail facilities within the vicinity of the Site. The closest is a food retail unit that is occupied by Sainsbury's. In addition, the centre of the village is located within a 5 minute walk of the site.

A range of local amenities are located within the centre of Lymm such as the following:

- Sainsbury's convenience store
- Post Office
- Bakery
- Butchers
- Two pharmacies
- Lloyd's Bank
- Library
- Various restaurant
- Leisure facilities



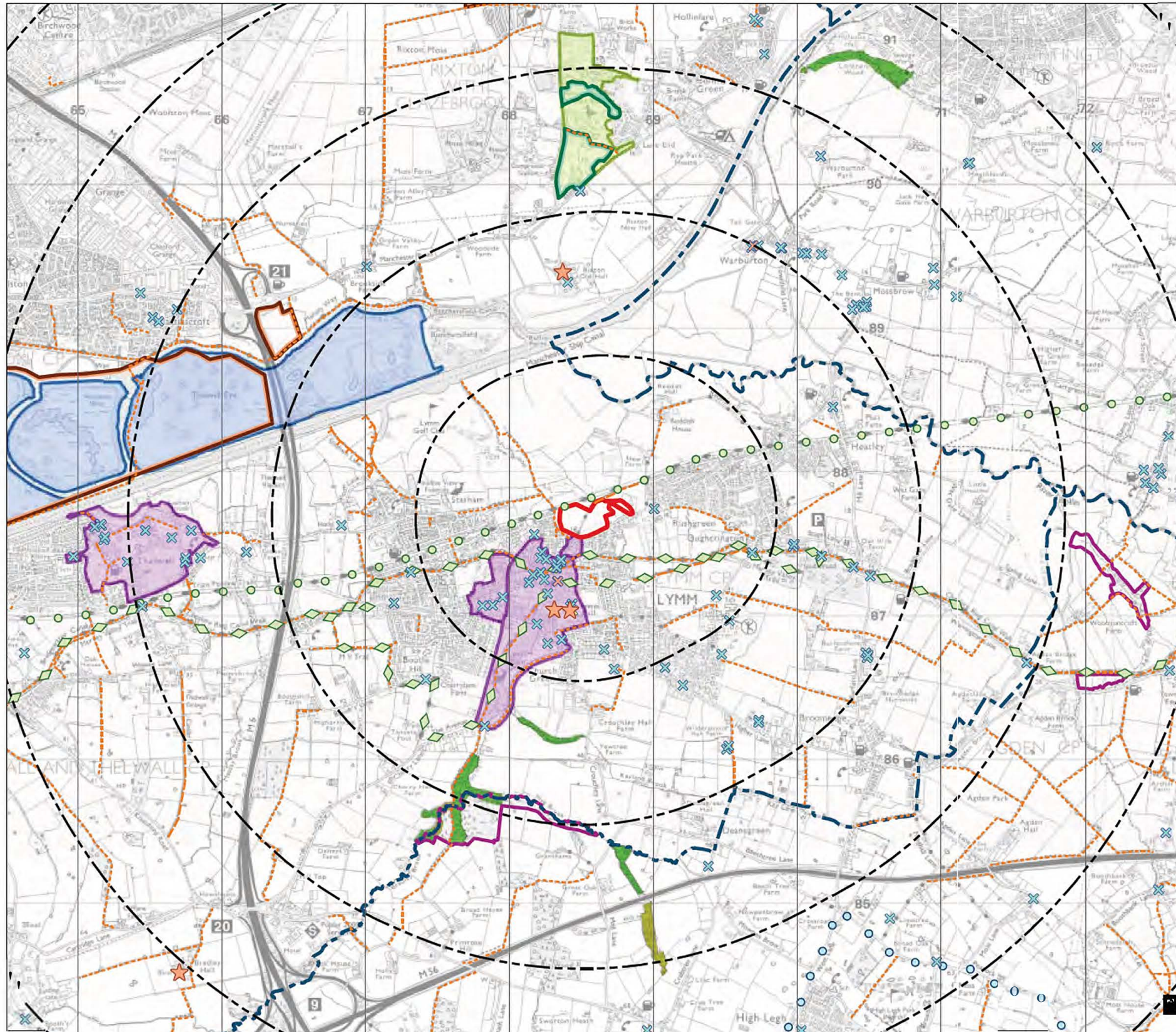





















# FACILITIES PLAN



- c=J Site boundary
- c:J Lymm Village Centre
- R Bus stop
- Bus route
- R Food store
- S High school
- S Primary school
- + GP
- Pharmacy
- @ Dentist
- E Pre-school
- R Post office
- @ Library
- @ Church
- 400m (5 minute walk)
- 800m (10 minute walk)

# LOCAL LANDSCAPE



-  Preliminary Site Boundary
- ( --- ), 1km buffers from site boundary
-  Unitary Authority boundaries
- Landscape Designations :**
-  Ancient and Semi-Natural Woodland
-  Ancient Replanted Woodland
-  Authorised Landfill Sites
- Public Access :**
-  Public Footpaths
-  Public Bridleways
-  Restricted Byways
-  Long Distance Footpaths
-  National Cycle Route
-  Link to NCR
-  Regional Cycle Route
- Heritage Designations :**
-  Conservation Areas
-  Scheduled Monuments
- Listed Buildings
- Grade I
- Grade II\*
- Grade II
- Biodiversity Designations :**
-  Special Areas of Conservation
-  Sites of Special Scientific Interest
-  Local Nature Reserves
-  Local Wildlife Sites
-  Wildlife Trust Reserve

# 06 CONSTRAINTS AND OPPORTUNITIES



The Site is not subject to or near to any restrictive environmental designations. There are no constraints which present an obstacle to development.

Instead, the Site has substantial opportunities to create an exemplar residential development. Strong place-making and high quality landscape features can be provided, which will ensure that the Site is an attractive and tranquil residential neighbourhood with a distinct and long-lasting environmental character.

Key and unique opportunities include the ability to:

- Enhance existing landscape features, such as Reddish Lane and the trans pennine trail, to provide a truly landscape led approach which creates an unparalleled recreational and biodiversity area for Lymm
- To create a strong settlement edge to the eastern approach to Lymm along Rushgreen Road and appropriate response to the entrance to the adjacent Conservation Area and the existing distinctive village character
- Integrate with the existing community at Lymm and connect to services and facilities which are in very close proximity
- Retain, adapt and refurbish the existing 'Cheshire' railings along the western portion of the southern boundary
- Retain and enhance existing mature landscaping to Reddish Lane and retain Reddish Lane as an access to the Trans Pennine Trail and existing property
- Create connections to existing Public Rights of Way in the vicinity of the site
- Respond positively to the New Road conservation area with the retention of a green landscaped entrance
- Retain and enhance mature landscaping on the site's boundaries
- Provision of extensive open space throughout the development which could be used by existing and future residents
- Development set back from the edge of the conservation area and arranged and designed to provide a positive setting



Key	
<b>Constraints</b>	
1	Existing mature trees and Landscaping to Reddish Lane
2	New Road Conservation area
3	Main Site Access from Rushgreen Road
4	Existing mature trees and Landscaping to Rushgreen Road and site boundaries
5	Views into the site from Rushgreen Road
6	Green 'corridor' to Rushgreen Road
7	Existing Properties accessed from Reddish Lane
8	Existing Allotments
<b>Opportunities</b>	
09	Secondary Access from Yew Tree Close
10	Create Connections to Existing Bridleway 00198/48, foot-path 193/20 and Trans Pennine Trail
11	Trans Pennine Trail
12	Footpath 193/20
13	Bridleway 00198/48
14	Respect views towards New Road Conservation Area
15	Create Green Buffer from future development to Rushgreen
16	Public Combined Sewer
17	Abandoned Public Sewer
18	Public Surface Water
19	Brook

Visual corridor from the conservation area



# CONSTRAINTS AND OPPORTUNITIES



EA Flood Map for Lymm

Source: Environment Agency - downloaded 25/09/2017



## Ecology and Tree:

The Site is not recognised for its biodiversity value. It is not subject to any ecological designations, such as SSSI's, SBI's or Local Nature Reserves, and there are no such designations nearby.

In due course, detailed surveys of the flora and fauna will be undertaken to ensure that there will be no harm to any high value species. There are opportunities to improve biodiversity at the Site through the provision of enhanced habitats, including new green space.

Given that the Site is currently used for agriculture, it contains very few trees. All existing high value trees and hedgerows will be retained wherever possible alongside significant new tree planting, to enhance the character of the new development. Overall there will be an increase in the number of trees at the Site.

## Flooding and Drainage

The entirety of the Site is located within flood zone 1 of the Environment Agency's Indicative Flood Map which means that it is considered to have a low risk of flooding.

Initial investigations have indicated that Site drainage can be achieved via an appropriately designed Sustainable Urban Drainage System (SuDS).

## Landscape

The landscape constraints and opportunities at the Site have been assessed by WYG, a multi-disciplinary team of Landscape Architects.

The site falls within the southern portion of National Character Area 60 - Mersey Valley, which consists of a wide, low-lying river valley landscape focusing on the River Mersey, its estuary, associated tributaries and waterways.

Warrington Borough Council produced a Landscape Character assessment in 2007. The Site is identified in this document as lying within Landscape Character Type 5 River Flood Plain and Landscape Character Area SA River Mersey/Bollin (East). The former railway line embankment however, creates a strong physical and visual barrier between the Site and the wider river flood plain to the north. The Site in terms of current land use, is connected to the farmland to the north (south of the River Bollin flood plain), and generally associated with the large farm complexes to the north such as Reddish Hall to the north west of the Site. The Site itself however, is separate in character to this wider area of farmland. The landscape to the south of the Trans Pennine Trail is part of a more intimate and contained landscape surrounded by built development of various forms including the former railway line and residential development.

The Site is not recognised as having a special landscape quality and is not the subject to any landscape designations. Residential development at the Site could be brought forward in a manner which was sympathetic to its local landscape and townscape context, with any landscape and visual effects minimised and further offset by a strong landscape strategy to ensure that the development was considerate of its setting. The former railway line /Trans Pennine Trail could form a strong new Green Belt boundary to the north of the site and the open countryside beyond the former railway line to the north.

### Highways

A detailed appraisal of the highway network and access constraints and opportunities has been undertaken by Croft Transport Solutions.

Vehicular access to the Site can be achieved along the Rush Green Road frontage. The Site has the potential to accommodate around 165 residential dwellings. As such, it is likely that only one formal vehicular access point would be required.

The main vehicular access located on Rush Green Road can accommodate a formal priority junction arrangement with standard geometric parameters for residential developments with a 5.5 metre wide carriageway, footway on both sides of 2 metres wide and 10 metre radii.

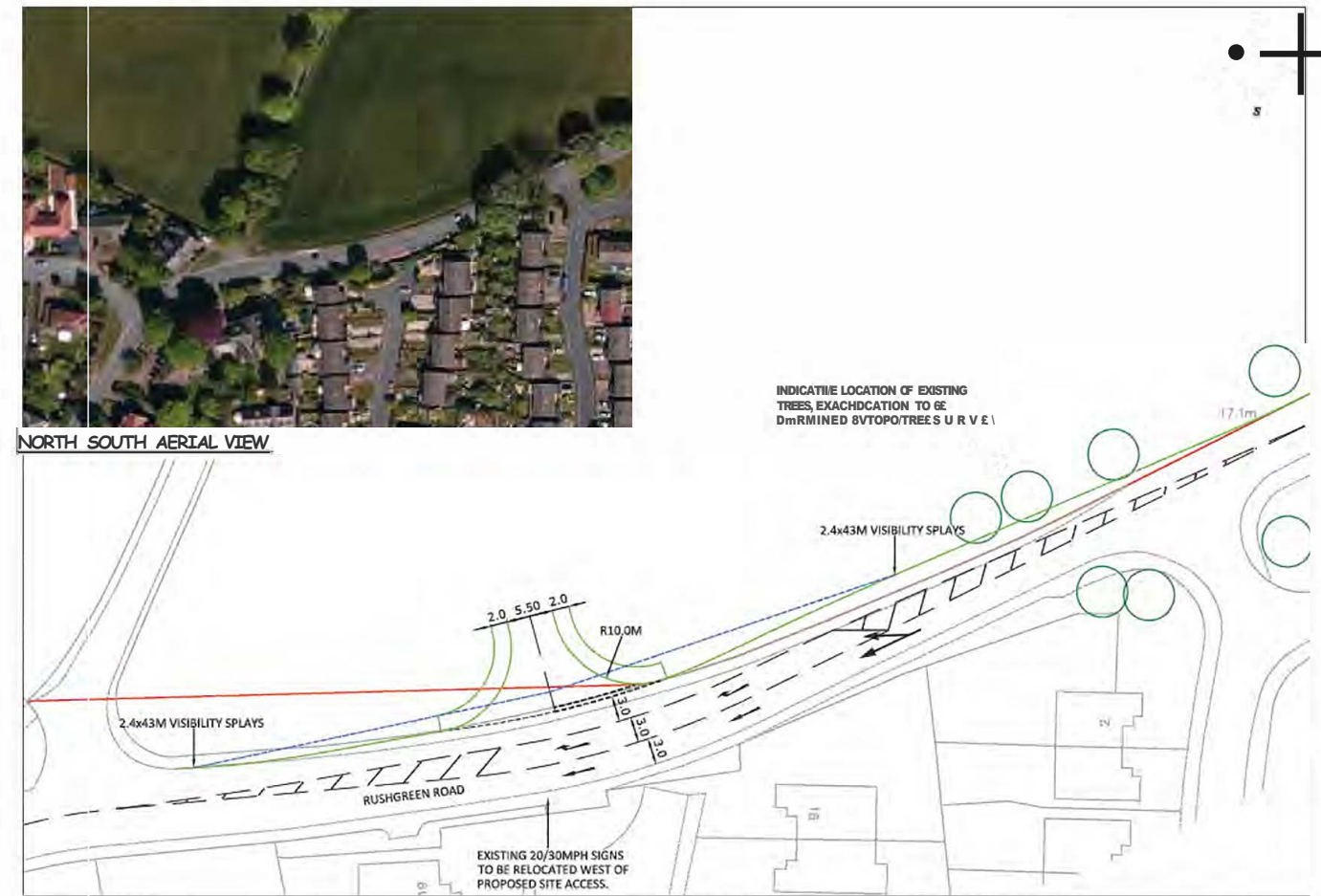
Visibility can be achieved in both directions of at least 2.4 metres by 43 metres which ensures it complies with the guidance in Manual for Streets and Manual for Streets 2. The junction can also incorporate a formal right turning lane for traffic turning into the Site from Rush Green Road. All of this geometry can be accommodated within either the Site boundary or within the current limits of adopted highway.

The proposed junction has been located to ensure the greatest distance away from the existing junction of Reddish Lane and Rush Green Road to avoid the row of trees that are located along the eastern portion of the Rush Green Road frontage.

This junction has been shown on Drawing Number 1549-F01 and demonstrates that the proposed vehicular access can be adequately accommodated.

In terms of off-site impact the proposals are likely to generate in the region of 100 to 120 vehicular trips in the two busiest hours of the day which are likely to be between 0800 and 0900 hours and 1700 to 1800 hours. There are numerous routes for traffic to be dispersed onto the local highway network.

Vehicles travelling towards Sale and Altrincham will do so to/from the east and utilise either Rush Green Road and/or Sandy Lane/Mill Lane to the east of the Site. Those vehicles travelling towards Warrington or the M6/M56 are likely to travel through the village centre and will be travelling to/from the Site to the west.



**Proposed Site Access**

There are no particular capacity constraints to the local highway network which would provide an issue for this additional traffic generation although this would be demonstrated in detail within a Transport Assessment that would accompany any formal planning application on this Site.

### Heritage

The Site abuts the northern boundary of the New Road Conservation Area. Wardell Armstrong have undertaken an assessment of the Site to assess what impact, if any, the proposed development would have on designated and non-designated heritage assets within the vicinity of the Site. This assessment concludes that the evidential, historical and aesthetic values of Lymm Conservation Area would be unaffected by development.

The masterplan proposes to create a new green landscaped entrance to the site which would provide a significant amount of open space to respond to the setting of the New Road Conservation Area and maintain the Open views from the conservation area to the site. The new site entrance has the ability to enhance the experience of the conservation area through new tree and hedgerow planting, green landscaped design and retention of the Cheshire railings.



**Key**

- Development blocks
- f) Development blocks low density
- Public open space
- Indicative tree planting
- Movement network
- Key focal buildings
- f) Views from the POS
- Retained trees and Landscaping along Reddish Lane
- Bridlepath 00198/48
- @ Views into site
- (D) Active frontages
- (D) Footpath 193no
- ⌘ Conservation area
- ⌘ Arrival space
- ⌘ Views to key focal buildings
- ⌘ Trans PeMineTrail
- 16 Access de lls as per crofts drawing number 1549-01
- @ Buffer to Rushgreen Road to incorporate existing mature landscaping
- C Potential secondary access
- BS Existing bus stops on Rushgreen Road

**Areas**

- Gross Area - 7.23Ha
- Public open space - approx 1.70Ha (Including Reddish Lane & Buffer to Rushgreen Road)
- Nett Area Circa - 5.53Ha

**Density**

- 553Ha x 30 Dwellings per Hectare = 166 Dwellings

# 07 THE MASTERPLAN

## INTRODUCTION



The site can accommodate up to 165 high quality family homes comprising a range of 2, 3, 4 and 5 bed homes.

The proposed scheme will retain a consistent reference to the character of Lymm and will embody the key principles of sustainability, promoting healthy lifestyles and a high quality of life through the retention and enhancement of public rights of way and access to safe and multi-functional green spaces.

The properties will be generously spaced and softened by a network of green infrastructure where open spaces will function individually, but will together add up to a comprehensive green environment which permeates throughout the development.

The main access to the site will be off Rushgreen Road with the development frontage set back providing a generous arrival green and attractive gateway into the scheme. The public open space in this location will respect and compliment the conservation area to the south and will enhance the retained trees and landscaping along Reddish Lane adding to the visitor experience.





# Reddish Lane Lymm

Draft Masterplan

September 2017 | 1:500 @ A0 Drawing No: SH005 SK01 Revision: P2



# VISION PRINCIPLES



The Site will provide for a new sustainable community that:

- Will successfully integrate within the area through retention and celebration of existing landscape features including existing trees and important hedgerows which exist both internally and to the perimeter of the Site.
- Will successfully integrate important PROW and existing pedestrian connections through the Site, allowing linkage with surrounding development to the west, south and east.
- Will ensure proposed development is configured at key access points with an outward aspect, helping to celebrate entrance to the development. The southern boundary will be enhanced with a green landscaped Site access which will provide an attractive entrance to the development.
- Development set back from the edge of the conservation area and arranged and designed to provide a positive setting.
- Will provide for a 'landscape dominant' character typified by retention of landscape features such as Reddish Lane. The development has the capacity to provide for extensive green linkages to the eastern boundary through the retention of large informal areas of open space.
- The location of the Site will allow both proposed and existing development to use the extensive areas of open space.
- Could potentially provide formal play provision to the eastern section of the Site.
- Successfully integrate existing watercourses with proposed SUDS areas to provide for areas of new ecological value. SUDS areas to be located on localised low points of the Site to the Northern boundary.
- Successfully include for existing services as part of the development proposals with the opportunity to create green routes through the development.
- Are cognisant of the form and density levels of surrounding development, with the opportunity to provide a contextual yet distinctive design response.

# 0 8 BENEFITS AND INFRASTRUCTURE



In order to justify the release of this Site from the Green Belt the Council must in their plan making demonstrate exceptional circumstances but also ensure that this would constitute sustainable development. The NPPF states that "sustainable development is about positive growth - making economic, environmental and social progress for this and future generations."

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable developments, which should be seen as a golden thread running through both plan-making and decision-taking."

The development of approximately 165 new homes on this Site in Lymm will deliver significant and lasting economic, social and environment benefits to the local community.

## Social Benefits

- Family homes - the Site can address the growing need for new high quality and modern family homes in Lymm. It will deliver a wide range of new homes in terms of type and size, to meet the needs of different families in the community.
- Affordable homes - the new community will include a substantial number of new affordable homes, such

as starter homes and affordable rented houses. This will significantly enhance opportunities for home ownership, helping less affluent families and young first-time buyers to get onto the housing ladder.

- Open Space - the development will provide a significant amount of public open space for new and existing residents to enjoy. There will be enhanced connectivity to recreation facilities beyond the Site for the existing housing development to the west, south and east.
- Trans Pennine Trail - enhanced access to the Trans Pennine Trail to the north to provide opportunities for walking and cycling and connections to these established routes will improve health and well-being.

## Environmental Benefits

- Environmental improvements - the new high quality landscape proposed can provide new and enhanced habitats to increase the biodiversity value of the Site, whilst providing new landscape features and green spaces for the community to enjoy.
- New drainage infrastructure - the landscape strategy for the Site includes a Sustainable Urban Drainage Scheme (SuDS).
- Recreational resources - the Site will provide new open space and green infrastructure for the local community to enjoy and spend time in.
- Access - as the Site is within a 5 minute walk of the village centre, this will encourage new residents to use pedestrian and cycle routes into the village rather than using the private car. Development to the east, west and south of the village will result in a dependency on the private car given the distance to the services and facilities within the village centre.

## Economic benefits

- Economic growth - the Site will bring new working age families to Lymm. This will be crucial to ensure that there is a resident labour force in the area, which can underpin sustainable economic growth without resulting in large increases of in-commuting from elsewhere in the region.
- New jobs - building new homes creates significant numbers of new jobs in construction, in the supply chain and in related services such as shops and leisure centres.
- Increased spending power - new homes will bring new economically active families into Lymm, who will spend their disposable income in local shops and services. This will boost businesses and increase local vitality and continued viability of local services and facilities.
- Increased revenue - the new homes will substantially increase Warrington Borough Council's revenue base as a result of significant increases in Council Tax income.
- New Homes Bonus - 165 new homes will result in a New Homes Bonus payment of £979,163 to Warrington Borough Council.

# BENEFITS AND INFRASTRUCTURE



The Site will provide a range of new and expanded infrastructure to ensure that the new development is sustainable and self-sufficient, has access to day-to-day services and facilities, and is capable of integrating successfully with the existing local community.



This could include investment in:

- New recreational open spaces and play areas for children
- New school places and improved facilities for primary and secondary children
- Expanded health services, including more places in GP surgeries and dental practices
- New landscaping, including tree planting and wetland areas
- New and improved bus services and cycle lanes

Story Homes can confirm that the Site is:

- Available for development. Story Homes has an agreement with the landowner, to bring the Site forward for residential development (subject to its release from the Green Belt). There are no legal or ownership constraints to its delivery;
- Achievable and viable for residential development. It is located in a strong market area which experiences high demand for new homes and there are no overriding constraints which present an obstacle to delivery.

# 09 CONCLUSION

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The emerging Local Plan recognises that Warrington must provide new homes both to *meet* the needs of its population and to underpin economic growth. Warrington Borough Council acknowledges that this cannot be achieved on brownfield land alone. Green Belt releases are essential.

This Vision Document sets out how the land at Reddish Lane, Lymm can provide a new, high quality residential development. It will provide attractive and well-built family homes as part of a sustainable natural and tranquil environment, integrated with new green and blue infrastructure. It will help Warrington to meet its growing and urgent housing needs.

The Site can be brought forward using a comprehensive masterplanning process, with significant involvement from both Warrington Borough Council and the existing local community.

This vision document provides the evidence to demonstrate that this Site in Lymm represents a logical and sustainable development opportunity where the exceptional circumstances to support its release from the Green Belt are clear. A number of technical assessments have been undertaken which confirm that there are no physical constraints or other potential impacts or environmental conditions which could preclude the development of the Site for housing. The proposed development clearly accords with the three dimensions of sustainable development as set out in the NPPF.

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# NEXT STEPS

The Site is in the control of a well-known high quality housebuilder (Story Homes), and is considered suitable and deliverable within the first 5 years of the emerging Local Plan period.

Story Homes are committed to progressing the emerging Concept Masterplan towards a high quality residential development that responds to the local housing need, whilst taking into account and reflecting the character of the surrounding settlement, and ensuring the development of the Site would form a new defensible Green Belt boundary to the north of the village.

Story Homes looks forward to working with Warrington Borough Council to progress the proposals for the Site and welcomes any feedback.

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**Warrington Proposed  
Submission Version Local  
Plan**

**Representations on behalf of  
Story Homes**

**Land at Warrington Road, Culcheth**

**June 2019**

**LICHFIELDS**

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42154/03/SPM/NMi

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## 1.0 Introduction

### Purpose

1.1 Lichfields is instructed by Story Homes [Story] to make representations to the Warrington Proposed Submission Version Local Plan [Local Plan] published for consultation by Warrington Council in April 2019. These representations follow previous representations to the Local Plan Preferred Development Option which were submitted on behalf of Story by other parties in September 2017.

1.2 These representations are made in the context of Story's development interests in Warrington at:

1 Warrington Road, Culcheth; and,

1.3 The following documents accompany these representations:

1 Warrington Road, Culcheth Vision Document (September 2017)

1.4 Story fully supports the allocation of the Warrington Road site under policy OS3. For the reasons set out in these representations, we also consider that there is the opportunity to identify a further parcel of land adjacent to the Warrington Road site for residential development. This area of additional land is identified as Parcel 2 on the location plan at Appendix 1

1.5 It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the National Planning Policy Framework [the Framework].

1.6 There is no statutory definition of "soundness". However, the Framework states that to be sound a Local Plan should be:

- 1 **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 2 **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3 **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
- 4 **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.7 In addition, the Framework<sup>1</sup> states that:

*"Plans and decisions should apply a presumption in favour of sustainable development.*

*For plan-making this means that:*

---

<sup>1</sup> The Framework - §11

- a *Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b *Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - i *The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

1.8 This report demonstrates that a number of policies within the Local Plan require amendments in the context of the tests of soundness established by the Framework.

### **Structure**

1.9 Representations to the following Local Plan policies are provided in this report:

- 1 Policy DEV1 – Housing Delivery
- 2 Policy DEV2 – Meeting Housing Needs
- 3 Policy GB1 – Green Belt
- 4 Policy INF1 – Sustainable Travel and Transport
- 5 Policy INF5 – Delivering Infrastructure
- 6 Policy ENV7 – Renewable and Low Carbon Energy Development
- 7 Policy OS3 – Culcheth

## 2.0 **Policy DEV1 – Housing Delivery**

### **Introduction**

- 2.1 Policy DEV1 sets out the housing requirement for the 20 year plan period from 2017-2037 as a minimum of 18,900 new homes (945 dpa).
- 2.2 The policy identifies the housing distribution which proposes the majority of new homes (13,726 dwellings) to be delivered within the existing urban areas of Warrington, and the removal and allocation of two Green Belt sites known as the Garden Suburb (6,490 dwellings) and the South West Urban Extension (1,631 dwellings). In addition, a minimum of 1,085 homes are to be delivered on allocated sites removed from the Green Belt, including 200 homes in Culcheth and 430 homes in Lymm.
- 2.3 The policy proposes a ‘stepped’ housing requirement as follows:
- a 2017-2021 (first 5 years) – 847 homes per annum
  - b 2022 to 2037 (following 15 years) – 978 homes per annum
- 2.4 The policy states that the Council will give consideration to a partial review of the plan should monitoring indicate that a 5-year deliverable and /or subsequent developable supply of housing can no longer be sustained.

### **Housing Requirement**

- 2.5 The Warrington Local Plan Core Strategy [WLPCS], adopted in July 2014, sets out the Council's vision, aims and strategy for the Borough, including the overarching planning policies that will guide growth during the period to 2027.
- 2.6 However, in February 2015 the High Court quashed parts of the Warrington Local Plan Core Strategy, specifically:
- 1 Policy W1 and Policy CS2, and specifically to *"delivering sufficient land for housing to accommodate an annual average of 500 dwellings (net of clearance) between 2006 and March 2027, and a minimum of 10,500 over the whole period"*; and,
  - 2 Paragraph 6.38 relating to the delivery of *"1,100 new homes as a sustainable urban extension to West Warrington."*
- 2.7 The Council has resolved to prepare a new Local Plan, rather than seek to alter the Core Strategy to resolve the issues raised by the High Court. As part of the formulation of the evidence base for the new Local Plan, the Council has reviewed its Local Housing Need [LHN] using the standard methodology and alternative, employment-led, approaches.
- 2.8 Story welcomes the Local Housing Need Assessment's [LHNA's] use of the 2014 Sub-National Population Projections [SNPP], the Sub-National Household Projections [SNHP] and the Mid-Year Population Estimates [MYE]. Furthermore, Story agrees with GL Hearn's revised methodology which does not seek to adjust the SNPP to take account of Unattributable Population Change [UPC]; provides an uplift to counter falling household formation rates amongst younger households; and in particular, seeks to align with economic growth needs. Story considers that the Council's approach in respect of the calculation of LHN is, in general, positively prepared and supports Warrington's proposals to cater for its own housing need within its authority area. However, Story has some general comments as set out below.
- 1 The Council's LHN is aligned with a level of job growth that is well below what has been achieved in recent years and which is inconsistent with the employment land target. This

could result in a number of negative externalities including unsustainable commuting patterns. The assumptions underpinning the GL Hearn analysis are significantly over-inflating the age cohorts likely to comprise the bulk of the labour force in the years ahead, thus boosting job growth without a commensurate increase in housing need. GL Hearn's modelling suggests that a growth of 7,530 residents aged 15-64 will somehow support an increase of 16,200 economically-active residents, and 19,100 jobs (954 p.a.). This appears unlikely.

- 2 The Council's evidence suggests that they are planning for a level of employment land growth based on past take up rates, which equates to 362 ha going forward. By way of comparison, over that same time period, this level of B-Class land sustained 1,641 additional jobs annually – a figure more than 70% higher than the 954 p.a. job growth the 945 dpa figure equates to (see Table 3 in WBC's Economic Development Needs Assessment report). This indicates that the level of employment land that the Council is planning for will generate a level of job growth considerably in excess of the level that could be serviced by the increase in labour supply resulting from 945 dpa.
- 3 Story has concerns with GL Hearn's approach to calculating the annual affordable housing requirement. However, even taking the Council's evidence at face value, the LHNA identifies a very high level of affordable housing need of 377 p.a.. This represents a significant increase on the 250 dpa figure in the 2017 SHMA, suggesting that the situation is deteriorating. GL Hearn concludes that the affordable housing need (377 dpa) delivered at a rate of 25% of all delivery would require a total delivery of 1,508 dpa, although they are quick to clarify that this is not likely to be deliverable or realistic. Nevertheless, the LHNA explores the scale of uplift that could be appropriate to address needs:

*“However, the Council could still consider an increase to the OAN as per the PPG to deliver more affordable homes. There is no set methodology for how to do this, but other areas have used a nominal 5% or 10% uplift to the OAN when developing their housing requirement.*

*Given the affordable housing requirement in Warrington we have given consideration for such an uplift in Warrington if the 5% is applied to the OAN of 909 then we would arrive at a housing requirement of 955 dpa.*

*Ultimately this uplift above the standard methodology is a choice for the Council but a requirement of around 950 dpa would seem reasonable to examine and also aligns with the economic-led need.” [paragraphs 8.29-8.31]*

The Council appears to have ignored this advice and has retained the 945 dpa figure in its emerging Local Plan with no uplift to help meet the very high need for affordable housing.

- 2.9 Story considers that the Council should be planning for a higher LHN figure in the Local Plan in order to ensure that the above matters are addressed.

## **Housing Distribution**

- 2.10 Story generally supports the overall distribution strategy identified in the policy including the proposed Green Belt release and allocation of the South West Urban Extension (SWUE) site and the distribution of a proportion of the housing requirement to the outlying settlements.

## **Housing Trajectory**

- 2.11 The Housing Trajectory and Stepped Housing Supply set out in Policy DEV 1 and at Appendix 1 of the Submission Local Plan sets out WBC's current position on its housing trajectory of



deliverable and developable sites. This assessment has been prepared following the revised Framework definition of ‘deliverability’ and the publication of the Housing Delivery Test [HDT] results.

- 2.12 The Housing Trajectory suggests a total of 20,643 homes could be delivered over the plan period, of which 4,132 units would be delivered over the course of the first 5 years of the plan. The annual average delivery over the first five years of the plan is 826 dwellings, which equates to 87% of the 945 dpa LHN, and even below the stepped requirement of 847 dpa for the first 5 years. Story acknowledges that WBC has applied a stepped trajectory to its housing requirement, but is concerned that this serves only to push housing supply further back into the plan period. Indeed, given that Policy DEV1 (6) refers to 5 year monitoring and states that the Council will give consideration to a review or partial review Story is concerned that the Council should plan positively now and ensure that it identifies sufficient sites to support the Government’s objective of significantly boosting the supply of homes. This is discussed in more detail below.
- 2.13 The PPG<sup>2</sup> states that a stepped requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. It states that strategic policy-makers will need to set out evidence to support using stepped requirement figures, and not seek to unnecessarily delay meeting identified development needs. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.
- 2.14 In this instance, WBC has applied a stepped trajectory to accommodate for the increased delivery later in the plan period of the Waterfront, South West Urban Extension and Garden Suburb. At present, the Council cannot demonstrate a 5YHLS even with a stepped trajectory of 845 dpa for the first 5 years (equal to 4,225 homes), as Appendix 1 indicates that even if all the housing sites proceed precisely as planned, only 4,132 homes (826 dpa) are deliverable.
- 2.15 In addition, the results of the HDT indicate that WBC should apply a 20% buffer to the assessment of five-year housing land supply. This has not been included within the Submission Local Plan, which gives further weight to the argument that the authority cannot demonstrate a 5YHLS against the Local Housing Need.
- 2.16 The Submission Local Plan (Appendix 1) sets out a Housing Trajectory and Stepped Housing Supply over the course of the Plan period. This indicates that 4,132 units can be delivered over the course of the first 5 years of the plan from sites within the urban area and on Green Belt sites. Applying a 20% buffer as per the HDT would suggest that a requirement of 5,082 is needed – a shortfall of 950 units.
- 2.17 The PPG sets out how local authorities can demonstrate that they have a confirmed 5YHLS as part of the plan examination<sup>3</sup>:

*“The NPPF gives local planning authorities the opportunity to demonstrate a confirmed 5 year supply of specific deliverable housing sites. This needs to be done initially through the plan examination process, and may then be refreshed annually following adoption (provided the plan remains up to date), through the preparation of an Annual Position Statement. In both these circumstances, it will only be possible to establish a confirmed 5 year supply if an appropriate buffer has been applied and the authority’s assessment of its supply has been tested sufficiently through the examination or Annual Position Statement process.”*

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<sup>2</sup> Practice Guidance - ID: 3-034-20180913

<sup>3</sup> Practice Guidance – ID3-049-20180913

2.18 Story therefore considers that the Council is unable demonstrate a defensible five-year housing land supply position at the current time and should explore every avenue available to increase the supply of housing in the short term.

2.19 Part 6 of Policy DEV1 states the following:

*“Should monitoring indicate that a 5- year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan”.*

2.20 Story considers that the most effective way of ensuring sufficient housing supply is to identify ‘Plan B’ sites. In addition to allocating additional sites and identifying safeguarded land in the Local Plan a new policy should be introduced which provides a mechanism for its early review i.e. a ‘Plan B’ (such as adopted West Lancashire Local Plan Policy RS6 which is attached at Appendix 1). Specific sites should be identified as ‘Plan B’ sites now. This will ensure that the Local Plan is flexible and can respond quickly to the potential non-delivery of committed sites and any other shortcomings in its housing land supply.

2.21 It is crucial that the Council monitors its housing land supply position and where it is found to have fallen below an identified trigger point, it will permit these Plan B sites to come forward. This would ensure greater flexibility as it would remove the need for a formal plan review process to be undertaken if additional sites that are not allocated for housing are needed to boost the borough’s housing supply.

2.22 If there is a need for the release of Green Belt to provide sufficient ‘Plan B’ sites, these sites should be identified for release now. If there is then still an insufficient supply of housing, after Plan B sites have been implemented the Council can at that point enact an early review of the Local Plan.

2.23 Without such a mechanism in place, the Local Plan may not deliver the significant boost in housing that is required to meet the needs of the Borough and the Government’s objective of significantly boosting the supply of homes.

### **Supply beyond the Plan Period**

2.24 The Framework [§139] advises that where necessary plans should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period and be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

2.25 At the Local Plan Preferred Development Option Stage the Council proposed to remove further land from the Green Belt so that it could be safeguarded to meet development needs for a further 10 years beyond the Plan period. However, Story Homes notes that the Local Plan does not propose the identification of any safeguarded land to meet needs beyond the Plan period as the Council considers that there is likely to be a sufficient supply to meet housing needs for at least 10 years following. Table 4.2 of the Local Plan identifies the development needs beyond the Plan period and the indicative housing supply 2037 to 2047 as follows:

Table 2.1 Development needs beyond the Plan Period

Indicative Housing Requirement 2037 to 2047	
Annual household growth 2027-37*	617
Projected forward 2037 to 2047	6,170
Number of homes required 2037 to 2047**	6,312
Indicative Housing Supply 2037 to 2047	
Additional supply within Plan from flexibility	1,890
Illustrative town centre capacity	1,816
Small sites allowance	608
Garden Suburb delivery post 2037	2,289
Total indicative supply	6,603

Source: Warrington Proposed Submission Version local Plan Table 4.2

- 2014 Based Household Projections
- Based on calculation used in LHNA

2.26 The Local Plan (§4.1.24 to 4.1.26] states that rate of increase in households has decreased significantly over the last 10-year period of the Plan. It notes that over the period 2027 to 2037 household growth will reduce to an annual average of 617 homes per annum (2014 based household projections). It also notes that house price affordability will no longer be a significant issue and therefore any uplift beyond the household projections will be minimal. In addition, it states that the rate of job growth is forecast to decrease over time resulting in sufficient new homes to provide a balance with future jobs growth. However, given the uncertainties of making such projections so far into the future, Story Homes considers that a more sensible approach would be to apply the Local Plan annual requirement target beyond the Plan period rather than using a reduced figure.

2.27 Given the significant timescale until the end of the Plan period, Story is also concerned that the sources of supply identified to meet needs over this period may not deliver as anticipated. For example, whilst the plan is providing a 10% flexibility factor, the key purpose of this will be to ensure that sufficient homes are provided over the plan period in the event that sites do not deliver as anticipated. On this basis Story considers that this flexibility cannot be applied to the period beyond. There is also no guarantee that the illustrative town centre capacity will deliver as anticipated, as it could be the case that this land comes forward for alternative uses or its development is precluded for other reasons, such as land ownership. The identification of safeguarded land provides more certainty over where future development needs can be met beyond the plan period.

2.28 In order to ensure that that Green Belt boundaries will not need to be altered at the end of the plan period, Story therefore considers that the Local Plan should identify safeguarded land around the main urban area and outlying settlements.

## Tests of Soundness

2.29 Story Homes is concerned that Policy DEV 1 could be at risk of failing the tests of soundness for the following reasons:

- 1 It is not positively prepared: There is a risk that the objectively assessed needs will not be met.
- 2 It is not Justified: The evidence in the LHNA is not considered to be robust.
- 3 It is not effective: It will fail to deliver much needed housing in the early years of the plan.

- 4 **It is not consistent with national policy:** The provision of a deliverable five year housing land supply in accordance with the Framework [S73] will not be achieved. It fails to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

### **Recommended Change**

2.30 To address the conflict above and ensure the Policy is sound, it is requested that the Local Plan:

- 1 Reviews its housing requirement in light of the comments made above.
- 2 Identifies additional allocations to help meet housing need in the early years of the plan period.
- 3 Identifies 'Plan B' Sites' to ensure that any shortfall in housing supply over the Plan period can be met.
- 4 Identifies safeguarded land to ensure that Green Belt boundaries will not need to be altered at the end of the plan period.

## 3.0 Policy DEV2 - Meeting Housing Needs

### Introduction

31 Policy DEV2 deals with meeting housing needs including affordable housing, housing type and tenure, optional standards, housing for older people, self and custom build, and other needs.

### Consideration of Policy

32 Part 7 of the policy deals with housing type and tenure and Table 3 of the Local Plan provides a suggested mix breakdown based on the Local Housing Needs Assessment [LHNA]. Story Homes notes that the suggested mix for Affordable Housing (rented) properties differs between the LHNA and Local Plan as shown in Table 3.1.

Table 3.1 Warrington LHNA and Local Plan suggested affordable housing (rented) mix

	1-bed	2-bed	3-bed	4+bed
Affordable housing (rented) in LHNA	30-35%	30-35%	25-30%	5-10%
Affordable housing rented in Local Plan	20-25%	40-45%	20-30%	5-10%

Source: Warrington LHNA and Local Plan

33 The reason for this difference is not explicitly stated in the Local Plan. If it is not a drafting error Story considers the reason for this difference should be explained in the explanatory text to Policy.

34 Part 9 of the policy states the following:

*"In residential development of 10 dwellings or more, the Council will seek that 20% of homes should be provided to Building Regulation Standard M4(2) 'Accessible and Adaptable dwellings'".*

35 Story considers that a blanket requirement for 20% on sites of 10 dwellings is not justified. There is no clear explanation as to why a 20% requirement has been applied, as this is not specifically recommended in the LHNA.

36 Story recognises the value of providing accessible and adaptable dwellings for those sectors of society which require them. However, Story is also concerned that the process used to identify requirement in the LHNA does not fully address the requirements of the Practice Guidance. More specifically, no assessment of the accessibility and adaptability of existing stock appears to have been undertaken as required by the Practice Guidance. It could be the case that a significant proportion of the existing stock is capable of helping to meet the identified need which would reduce the need for further provision.

37 With regard to the provision of dwellings meeting M4(2) standards the LHNA [page 89] suggests that there is a need to increase the supply of adaptable dwellings. It suggests that the Council could consider (as a start point) requiring all dwellings to meet M4(2) Standards. For the reasons set out above we do not consider that such a requirement has been justified in the LHNA. However, the LHNA also recognises that this level of provision would not be appropriate and states:

• Practice Guidance - ID: 56-007-20150327

*“It should, however, be noted that there will be cases where this may not be possible (e.g. due to viability or site specific circumstances) and so any policy should be applied flexibly”.*

3.8 The Local Housing Needs Assessment therefore recognises that there may be circumstances in which provision is inappropriate.

3.9 Story considers that the recommendations on requirement should be reassessed to take into account the accessibility and adaptability of existing housing stock. Transparent evidence should also be provided to fully explain how any requirement identified has been derived. Flexibility should be provided in the Policy to allow for instances where any requirement level set may not be possible due to site specific circumstances.

3.10 Part 11 of the Policy states:

*“In residential development of 10 dwellings or more, 20% provision must be made to accommodate the needs of older people. The nature of this provision will be determined on a site by site basis depending on demand in a particular area and the appropriate type of provision for the site and/or scheme”.*

3.11 The explanatory text to the policy [§4.1.57] states that

*“For elderly people this may range from sheltered accommodation, residential care homes, extra care or adaptable homes depending on the nature of the site and proposals, and demand in the local area. For residential care homes a minimum of 80-120 bedroom spaces would be needed to reach the necessary critical mass to run a 24/7 operation. For sheltered housing a smaller number of approximately 30 units (or fewer) is acceptable.”.*

3.12 The land take for such uses could therefore have a significant impact upon the development potential of sites for general market housing and upon development viability. The Framework [§34] is clear that such policies should not undermine the deliverability of the plan. Story notes that the impact of this requirement upon site viability does not appear to have been factored into the Council's Viability Assessment.

3.13 Story is also concerned that, as this requirement could possibly include adaptable homes, there may be an element of 'double counting' given that Part 9 of the policy also sets out a requirement for adaptable homes.

3.14 For the above reasons, Story considers that this requirement is not justified and that this need would be better met through the allocation of specific sites which specifically provide for the types of accommodation identified.

## Tests of Soundness

3.15 Story is concerned that Policy DEV2 would not meet the tests of soundness because:

- 1 **It is not justified:** The Local Plan evidence base does not support a policy which sets a 20% blanket requirement for accessible and adaptable dwellings and a 20% requirement for Housing for Older People, in residential development of 10 dwellings or more. There is also the risk of an element of 'double counting' given that both parts 10 and 11 of the Policy could require adaptable homes.
- 2 **It is not consistent with national policy:** The impact of accommodating the needs of older people upon site viability does not appear to have been factored into the Council's Viability Assessment, contrary to the Framework.

## **Recommended Changes**

3.16

In order to help ensure the policy is sound it is considered that:

- 1 The requirement for accessible and adaptable dwellings should be reassessed to take into account the accessibility and adaptability of existing housing stock. Transparent evidence should also be provided to fully explain how any requirement identified has been derived. Flexibility should be provided in the Policy to allow for instances where any requirement level set may not be possible due to site specific circumstances.
- 2 Part 11 of policy DEV2 should be deleted and land should be allocated that specifically provides for the types of accommodation identified.

## 4.0 **Policy GB1 – Green Belt**

### **Introduction**

- 4.1 Policy GB1 identifies the areas of land which are proposed for removal from the Green Belt in the Local Plan. The Policy and draft Proposals Map shows Story’s site at Warrington Road, Culcheth as land removed from the Green Belt.

### **Consideration of Policy**

- 4.2 The Local Plan sets out the exceptional circumstances sought by the Framework [S137] to justify the release of Green Belt land. This includes a demonstration of the exceptional circumstances for each area, including the outlying settlements, the purpose of which is to increase and support the vitality and viability of local services. Story Homes agrees that an exceptional circumstances case has been demonstrated for the release of Green Belt land, including around the outlying settlements.
- 4.3 Story also supports the removal of the site at Warrington Road, Culcheth from the Green Belt as proposed in Policy GB1 and on the Proposals Map. The land to be released is identified in the 2016 Green Belt Assessment as making a ‘weak’ contribution to the Green Belt purposes. Story Homes agrees with this assessment. Only three parcels around Culcheth fall within this ‘weak’ category’ with the remaining 12 being assessed as ‘strong’.
- 4.4 Given this ‘weak’ Green Belt contribution and the strong sustainability credentials of the site, it is considered to be appropriate for removal from the Green Belt.



## 5.0 **Policy INF1 – Sustainable Travel and Transport**

### **Introduction**

- 5.1 Policy INF1 seeks to deliver the Council objectives of improving the safety and efficiency of the transport network, tackling congestion and improving air quality, promoting sustainable transport options, reducing the need to travel by private car and encouraging healthy lifestyles.

### **Consideration of Policy**

- 5.2 Part 1(j) of the policy states that the Council will expect development to consider how it can be futureproofed, through the provision of measures to support new and emerging technologies, such as Autonomous Vehicles.
- 5.3 Whilst Story recognises the potential benefits of futureproofing development, there can be no guarantee that some forms of new and emerging technology will ever reach the mass market. It is therefore difficult to foresee which forms of technology will need to be supported through development at the current time. In any event, it is likely that technology such as autonomous vehicles will be designed to adapt with existing development, and futureproofing may not therefore be required to accommodate it.

### **Tests of Soundness**

- 5.4 Story is concerned that Policy INF1 would not meet the tests of soundness because:
- 1 **It is not justified:** Story considers that it will not be possible to futureproof development as suggested as it is not possible to foresee what forms of new and emerging technology will ever reach the mass market

### **Recommended Change**

- 5.5 In order to ensure that Policy INF1 is sound, it is considered that Part (j) of the policy should be deleted.

## 6.0 Policy INF5 – Delivering Infrastructure

### Introduction

- 6.1 Policy INF5 requires development to provide or contribute towards the provision of the infrastructure needed to support it.

### Consideration of Policy

- 6.2 Part 6 of the policy states that:

*“The Council will only consider the viability of development proposals at the planning applications stage where:*

*a. required planning obligations are in addition to those considered as part of the Local Plan’s viability appraisal; or*

*b. where there are exceptional site specific viability issues not considered as part of the Local Plan’s viability appraisal.*

*In these cases, applicants should provide viability evidence through an ‘open book’ approach to allow for the proper review of evidence submitted and for reasons of transparency. The Council will then be able to balance the benefits of the proposals against any harm arising from not securing the full planning obligation requirements”.*

- 6.3 The supporting text to the policy [S7.5.7] states that on larger site allocations, including the proposed urban extensions, the infrastructure requirements for the first 5 years of the plan have been identified in detail.
- 6.4 Whilst the Council has considered the implications of infrastructure provision in its Viability Appraisal to a certain extent, Story considers that the Council's evidence needs to demonstrate, in a transparent way, how all of the Policy requirements within the draft plan have been factored into the Assessment on an item by item basis. With regard to this matter, Story notes that there is also a lack of transparency in the Infrastructure Delivery Plan [IDP] on the precise infrastructure costs associated with the Policy OS3 Culcheth allocation.
- 6.5 We have dealt with this matter in further detail in the response to the Council’s Viability Assessment which forms part of our response to Policy OS3.

### Tests of Soundness

- 6.6 Story is concerned that Policy INF5 would not meet the tests of soundness because:
- 6.7 **It is not justified:** The information provided by the Council does not demonstrate in a transparent way how all of the policy requirements within the Local Plan have been factored into the Viability Assessment.

### Recommended Change

- 6.8 The Viability Assessment work undertaken by the Council needs to be reviewed to ensure that the detail of all of the required infrastructure contributions is dealt with on an item by item basis to provide sufficient detail of all of the likely infrastructure contributions required. This information also needs to be included in the IDP.
- 6.9 This will help to avoid the need for the submission of further viability evidence to be provided at the planning application stage.

## 7.0 **Policy ENV7 – Renewable and Low Carbon Energy Development**

### **Introduction**

7.1 Policy ENV7 sets out the approach and guidance on how development should respond to energy issues across the Borough.

### **Consideration of Policy**

7.2 Part 6 of Policy ENv7 requires the following:

*In the strategic housing and employment allocations as defined in Policies MD1 to MD4 and OS1 to OS9 and identified on the Key Diagram/Polices Map the Council will seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems that would use or generate renewable or other forms of low carbon energy. In these locations all development will be required to establish, or connect to an existing, decentralised energy network unless this is shown not to be feasible or viable, in which case development will be required to;*

*a. make provision to enable future connectivity in terms of site layout, heating design and site-wide infrastructure design; and*

*b. to ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy source(s).*

7.3 Story is concerned that the cost of providing such infrastructure has not been factored into the Viability Assessment and the implications of its provision cannot therefore be properly assessed.

### **Tests of Soundness**

7.4 Story Homes is concerned that Part 41 of Policy MD3 would fail the tests of soundness because:

1 **It is not justified:** From the Local Plan Viability Assessment, it is not clear whether the costs of providing such infrastructure have been factored into the viability appraisals undertaken.

### **Recommended Change**

7.5 The Council's evidence needs to demonstrate, in a transparent way, how the requirement for establishment or connection to decentralised energy systems in Policy ENV7 has been factored into the Viability Assessment.

## 8.0 **Policy OS3 – Culcheth**

### **Introduction**

- 8.1 Policy OS3 proposes to remove land to the east of Culcheth from the Green Belt and allocates the land for a minimum of 200 homes. Story fully supports the allocation of the Culcheth site, the majority of which comprises land which is being promoted by Story. A plan showing the part of the allocation being promoted by Story is attached at Appendix 2. This land is identified as Parcel 1.

### **Deliverability**

- 8.2 The land being promoted by Story is within single ownership and Story have an agreement with the landowner to bring forward the site for residential development. There are therefore no legal or ownership constraints to the delivery of housing on the site. The site is available for the delivery of housing now, it offers a suitable location for housing and Story Homes is committed to progressing a scheme as soon as the site is allocated. The site is therefore fully deliverable.
- 8.3 As noted below, the site allocation boundary shown on the draft Proposals Map and Figure 10.7 in the Local Plan includes a rectangular piece of land to the north of the land being promoted by Story. This land is being promoted by other parties. Story considers that the inclusion of this land within the allocation boundary to be appropriate as it will allow the development potential of land to be released from the Green Belt to be maximised. The masterplan attached at Appendix 3 demonstrates that all of the allocation can be delivered as a comprehensive scheme.
- 8.4 An assessment of the environmental and technical constraints on the site has identified that there are no overriding technical or environmental constraints that would prevent it from coming forward for housing development. A detailed appraisal of the highway network and access constraints and opportunities has been undertaken by Croft Transport Solutions. Vehicular access to the Site can be achieved both off Warrington Road and from Holcroft Lane. It is proposed to serve the Site through a primary and secondary access solution. There are no particular capacity constraints to the local highway network which would provide an issue for this additional traffic generation and this will be demonstrated in detail within a Transport Assessment that would accompany any formal detailed application for this Site.
- 8.5 Consultation has taken place with HSE with regard to the high pressure gas pipeline which runs through the site in a north to south direction. The pipeline has been heavy brick walled previously by National Grid which minimises the need for the significant consultation zones as depicted on the Council's policies map. An illustrative masterplan has been prepared by Story which shows the inner/middle consultation zones for the pipeline unpopulated with housing and used as a public footpath. Based on this masterplan a formal response from HSE on this matter states that it *"would not advise, on safety grounds against the granting of planning permission for the proposed development"*. A copy of the HSE response and the associated masterplan are attached at Appendix 4.
- 8.6 The site lies in a highly sustainable location with access to a range of shops, services and facilities within walking distance. Culcheth is served by a wide range of facilities including Culcheth Community Primary School, and Culcheth High School which are located on the opposite side of Warrington Road. These schools are supported by associated community facilities including a leisure centre, children's dentist and a day nursery. The village centre of Culcheth provides a range of additional facilities including a Sainsbury's foodstore, post office, GP surgery, pharmacy and public house.

- 8.7 The site is also well served by public transport. Bus stops are located on Warrington Road along the northern boundary with several other bus stops within walking distance. These stops are served by 30 minute services to central Warrington, along with services to other destinations including Leigh and Birchwood where major employment opportunities are available.
- 8.8 The future development of the site will have positive economic, social and environmental benefits and therefore constitutes sustainable development in accordance with the NPPF [para. 8]. The development of the site will bring a number of economic benefits including: additional Council Tax revenues and direct and indirect/induced job creation. Benefits from the construction of the site include the creation of jobs for the local economy where possible and the use of local construction firms and suppliers. Additional residents will also generate more spending power in the local area to enhance the vitality of Culcheth.
- 8.9 The development will also bring a number of social benefits. New homes will meet local needs and attract and welcome new families to the area and affordable housing to meet the identified needs of local residents. Public open space and recreation space would be available for use by both existing and future residents.
- 8.10 The site also offers a number of environmental benefits including access to public transport facilities and existing shops, services and facilities within walking distance of the site; pedestrian and cycle routes; new green infrastructure including green corridors and open space; and, a design which is informed by the existing landscape and incorporates and protects existing features.
- 8.11 In addition to the above community benefits, through local engagement with the Culcheth Community Primary School, Story Homes are also proposing to:
- Provide a new pedestrian crossing on Warrington Road. This will improve pedestrian access and also slow traffic on Warrington Road.
  - Improve the pickup and drop-off process surrounding the nearby educational facilities and the bus lay-bys to improve traffic flows at peak periods. We would welcome a meeting with the Council highways and education departments to establish how these improvements can be brought forward
  - In addition to a network of green infrastructure throughout the Site, Story Homes are also proposing to provide a network of public footpaths across the Site that utilise the recreational value of the new green spaces.
  - Explore with the Council how anti-social behaviour in the unlit play area/skate park to the west of the site can be discouraged.
- 8.12 In addition to supporting the proposed allocation at Culcheth, Story Homes would also like to submit additional land which is identified as Parcel 2 on the location plan at Appendix 2. This land is within the same ownership and is also considered to be fully deliverable as it is available now, offers a suitable location for development now, and is achievable. Parcel 2 measures approximately 4.45ha and has the potential to accommodate approximately 300 dwellings in conjunction with Parcel 1.
- 8.13 As illustrated in the Vision Document submitted alongside these representations, this land could be delivered as part of a comprehensive development with the proposed allocation. Further detail on Parcel 2 is provided in the Vision Document for the site which has been submitted alongside these representations.
- 8.14 Story wishes to make clear that this representation deals principally with the land edged red on the plan at Appendix 2 (Parcel 1). It is therefore requested that the Council considers the sites independently. However, if a need for further land for development around Culcheth was

identified for any reason, it is considered that Parcel 2 would also be suitable for allocation or for identification as a 'Plan B' site or safeguarded land.

## **Proposals Map**

- 8.15 The site allocation boundary shown on the draft Proposals Map and Figure 10.7 in the Local Plan includes a rectangular piece of land to the north of the land being promoted by Story. Story considers the inclusion of this land within the allocation boundary to be appropriate as it will allow the development potential of land to be released from the Green Belt to be maximised. This part of the allocation will be served via an existing access onto Holcroft Lane. The masterplan attached at Appendix 4 demonstrates that all of the allocation can be delivered as a comprehensive scheme.

## **Green Belt Boundary**

- 8.16 Paragraph 10.7.7 of the Local Plan states the following:

*“It should be noted that the Green Belt boundary has been amended in this location to allow for the site allocation and also to address any anomalies that the site allocation would otherwise create. In this instance the Green Belt boundary has been amended so that two residential properties on the corner of Holcroft Lane / Warrington Road (Lion’s Den and Little Lions Cottage) are also removed from the Green Belt. The exceptional circumstances for this change are those put forward in respect of the allocated site and the purpose of this further amendment is to secure a defensible boundary for the settlement of Culcheth”.*

- 8.17 The proposed amendments to the Green Belt boundary in this location are supported by Story and will result in a logical and defensible Green Belt boundary.

## **Consideration of Policy**

- 8.18 Story is committed to working within the Council in a proactive manner in order to bring forward the allocation which is fully supported. However, Story is concerned that elements of the proposed wording of Policy OS3 do not satisfy the soundness tests set out in the Framework and as such the policy may not be found sound at examination. Our response on these matters is set out detail below.

## **New Homes**

- 8.19 Part 2 of the policy seeks the provision of a minimum of 30% of homes to be affordable in accordance with Policy DEV2. Story generally supports the provision of 30% affordable housing on the site.
- 8.20 Part 4 of the policy requires specific provision to be made for self- build/custom build plots, subject to local demand as demonstrated by the Council’s self-build register.
- 8.21 Whilst it is accepted that new development should contribute to achieving an appropriate mix of housing, no evidence has been provided by the Council to demonstrate how the cost of providing self-build plots has been taken into consideration. The Framework states that all viability assessments including any undertaken at the plan making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available. We can find no evidence in the Viability Assessment that this cost has been taken into consideration. In the absence of this viability evidence, the Local Plan fails to demonstrate the impact this requirement would have upon the deliverability and developability of sites for market housing. In addition, Story notes that the provision of this infrastructure does not appear to have been included in the IDP.

- 8.22 The Council has a legal obligation to grant sufficient planning permissions to meet the demand for self-build and custom housebuilding. It is considered that the Policy approach would not be effective, as it would provide no guarantee that the Council's obligation to ensure that sufficient self and custom build plots are provided to meet demand, would be achieved. As it is not known what level of provision for such plots could be achieved on schemes by market housing developers, across the borough, the Council cannot rely on these sites as the source of supply to meet this demand. The Council should therefore identify an alternative mechanism to ensure that this demand can be met. Story Homes considers that the only way this can be achieved is through the Council identifying standalone sites which are specifically allocated to meet this demand. With regard to this matter, Story Homes also notes that another North West authority, West Lancashire Council, is not intending to implement a requirement for allocated sites to set aside land for self-builders, based on feedback from consultation which indicated that it would not be advisable.
- 8.23 We are aware that the requirement of custom build/self-build plots has been the subject of significant debate at two recent Local Plan Examinations (Oadby and Wigston and Harborough) because whilst there may be demand for them, the reality of having the means and finance to deliver them is not clear. The provision of self-build properties should not be to the detriment of delivering a comprehensive and well-designed scheme.
- 8.24 Story also notes that the Council's commitment to delivering of self build plots is set out in policy DEV2 so there would still be a mechanism for the Council to secure plots within the local authority area if this requirement is removed from Policy MD3.
- 8.25 Part 5 states that to reflect the site's urban fringe location adjacent to the open countryside the development will be constructed to an average minimum density of 30dph. Story considers that flexibility should be provided in the policy to deliver increased minimum densities in appropriate areas of the site such as the central area. Otherwise, the policy could result in the inefficient use of land by unnecessarily applying lower density requirements where higher density development would be appropriate. This approach would fail to align with the objectives of the Framework [§122] which seeks to promote the efficient use of land with development at high densities where appropriate.

### **Community Facilities**

- 8.26 Part 7 of the policy states that development will be required to make a contribution towards the provision of additional primary care capacity. However, there is no clarification in the policy or the explanatory text as to why such a contribution is required and no evidence is presented to justify it. In addition, it is not clear whether the contribution sought would be financial or involve the provision of facilities on site.
- 8.27 It is considered that this element of the policy would not satisfy the requirements of the Community Infrastructure Levy [CIL] Regulations 2010 (as amended)<sup>5</sup> and the Framework<sup>6</sup> which require planning obligations to meet all of the following statutory tests:
- 1 Necessary to make the development acceptable in planning terms – the wording of the policy and explanatory text do not explain why this is necessary to make development acceptable;
  - 2 Directly related to the development – the wording of the policy and explanatory text do not explain how it would be directly related to the development; and,

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<sup>5</sup> Community Infrastructure Levy [CIL] Regulations 2010 (as amended), Regulation 122(2)

<sup>6</sup> National Planning Policy Framework [§56]

3 Fairly and reasonably related in scale and kind to the development – the wording of the policy and explanatory text do not explain how this requirement would be fairly and reasonably related in scale and kind to development.

8.28 The Framework and CIL Regulations are clear that all three tests have to be met. For the reasons set out above it is considered that the policy as currently worded would fail all of the tests when applied.

### **Open Space and Recreation**

8.29 Part 8 of the policy states:

*“In accordance with the Council’s open space standards the overall provision of open space for the new residential development should include as a minimum:*

*a. Public open space – Delivery of a minimum of 2.03ha of open space, comprising 0.12ha of informal play space; 0.74ha of parks & gardens; and 0.92a of natural/semi-natural green space on the application site together with details of the management and maintenance arrangements.*

*b. Equipped play – Delivery of provision equating to 0.12ha (aligned to a NEAP) on the site together with details of the management and maintenance arrangements”.*

8.30 Whilst Story recognises the importance of providing open space within new development, it notes that there appears to be a discrepancy between the overall open space requirement identified (2.03ha) and the individual items identified (which add up to 1.78ha). The policy should therefore be reviewed and confirmation provided as to what the correct open space requirement is.

8.31 In addition, no robust evidence of existing open space provision and need appears to have been provided to justify this contribution. To ensure that the policy is transparent, the extent of the open space sought should be justified by robust evidence having regard to the open space standards and the quantity, quality and accessibility of existing provision. The reason as to why the overall open space requirement is greater the sum of its parts should also be clarified.

8.32 With regard to Part 8b of the Policy, Story notes that Shaw Street Recreation Ground lies directly to the west of the proposed allocation. There is therefore an opportunity to provide or improve facilities on the recreation ground to the benefit of the wider community and this could be secured via financial contribution. Story therefore considers that this part of the policy should be amended to allow for a financial contribution in lieu of on-site provision. This will allow the development potential of the allocation to be maximised in accordance with the Framework whilst also ensuring that the appropriate recreation facilities are provided in the vicinity of the site.

8.33 Part 9 of the Policy which requires proposals to make a contribution to expanding and enhancing existing or planned built leisure facilities and playing pitch provision that will serve residents of the development. In order to ensure that such a requirement is CIL compliant, in particular that it is necessary to make the development acceptable in planning terms, the need for these facilities needs to be demonstrated through the appropriate evidence including an assessment of existing provision. However, no evidence of this need is provided in the Policy and the accompanying explanatory text provides no reference to any relevant evidence base documents to support this requirement. In the absence of this evidence, Story considers that the inclusion of Part 9 is not justified.



## Transport and Accessibility

- 8.34 Part 13 of the policy states that the development will be required to make a contribution towards the delivery of sustainable transport modes. However, no explanation is provided in the policy as to what these sustainable transport modes are and why this contribution is necessary to make the development acceptable. Story notes that the site is well served by existing bus services which provide access to Warrington town centre and local employment opportunities as Birchwood. It is also located within walking distance of a range of shops, services and facilities in Culcheth. In the absence of any evidence to justify this contribution Story is concerned that Part 13 of the policy would not be found sound.

## Utilities and Environmental Protection

- 8.35 Part 17 of the Policy requires the development to mitigate the impacts of climate change; be as energy efficient as possible and seek to meet a proportion of its energy needs from renewable or low carbon sources in accordance with policy ENV7.
- 8.36 Part 6 of Policy ENV 7 states the following:
- “In the strategic housing and employment allocations as defined in Policies MD1 to MD4 and OS1 to OS9 and identified on the Key Diagram/Polices Map the Council will seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems that would use or generate renewable or other forms of low carbon energy. In these locations all development will be required to establish, or connect to an existing, decentralised energy network unless this is shown not to be feasible or viable, in which case development will be required to;*
- a. make provision to enable future connectivity in terms of site layout, heating design and site-wide infrastructure design; and*
- b. to ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy source(s)”.*
- 8.37 From the Local Plan Viability Assessment, it is not clear whether the costs of providing such infrastructure have been factored into the viability appraisals undertaken. Story Homes is concerned that, in the absence of this information, this policy requirement within Policy OS3 and policy ENV7 may be subject to challenge.

## Tests of Soundness

- 8.38 As currently worded Story Homes is concerned that Policy OS3 is at risk of failing the tests of soundness for the following reasons:
- 1 **It is not justified:** It is not clear from the Local Plan Viability Assessment how the cost of providing self-build plots has been taken into consideration. In addition, Story notes that the provision of this infrastructure does not appear to have been included in the IDP.
- There is no clarification in the policy or the explanatory text as to why a contribution towards primary care is required and no evidence is presented to justify it.
- No evidence of need for a contribution to expanding and enhancing existing or planned built leisure facilities and playing pitch provision, is provided in the Policy and the accompanying explanatory text.
- No explanation is provided as to why a contribution towards the delivery of sustainable transport modes is required.

It is not clear whether the costs of providing decentralised energy infrastructure have been factored into the Viability Assessment.

- 2 **It is not effective:** The Council has a legal obligation to grant sufficient planning permissions to meet the demand for self-build and custom housebuilding. It is considered that the Policy approach would not be effective, as it would provide no guarantee that the Council's obligation to ensure that sufficient self and custom build plots are provided to meet demand, would be achieved. As it is not known what level of provision for such plots could be achieved on schemes by market housing developers, across the borough, the Council cannot rely on these sites as the source of supply to meet this demand.

There appears to be a discrepancy between the size of the overall open space requirement identified for the allocation and the individual items identified.

- 3 **It is not consistent with national policy:** The policy could result in the inefficient use of land by unnecessarily applying lower density requirements where higher density development would be appropriate. This approach would fail to align with the objectives of the Framework [S122] which seeks to promote the efficient use of land with development at high densities where appropriate.

## Recommended Change

8.39 In order for the policy to be found sound at examination Story considers that the following matters need to be addressed:

- 1 The requirement for the provision to be made for self- build/custom build plots should be deleted from the policy.
- 2 The policy should be re-worded so that provision is made to deliver increased minimum densities in appropriate areas of the site (e.g. in the central area)
- 3 Clarification in the policy or the explanatory text is required as to why a contribution towards primary care is required and the relevant evidence presented to justify it.
- 4 The discrepancy between the size of the overall open space requirement identified for the allocation and the individual items identified should be addressed.
- 5 Evidence of the need for a contribution to expanding and enhancing existing or planned built leisure facilities and playing pitch provision should be provided.
- 6 Evidence of need for a contribution towards the delivery of sustainable transport modes should be provided.
- 7 Clarification should be provided as to whether the costs of providing decentralised energy infrastructure have been factored into the Viability Assessment.
- 8 Clarification should be provided on the discrepancy between the size of the overall open space requirement identified for the allocation and the individual items identified.
- 9 Whilst the Council has provided a breakdown of contributions sought on the site to Story, Story considers that this information also needs to be set out in the evidence base, including the Viability Assessment, in a clear and transparent manner.

## Warrington Local Plan Viability Assessment

8.40 Story fully supports the allocation of Policy OS3 Culcheth and wishes to ensure that the Council's evidence is robust and justified in the context of the soundness tests in the Framework. Story consider that the scheme is viable but not to the same extent as the Council. With regard to this matter, Story has concerns with the content of the Council's Viability Assessment and these have been covered in detail in the representations submitted in relation to

the SWUE site, which Story is promoting for allocation as part of a Consortium of developers. With regard to the Culcheth site, Story also wishes to raise the following comments at this stage:

- 1 Story notes that S106 and accessibility standards costs have been omitted in the appraisal for the Culcheth site. The total development cost calculation for the Culcheth site appears to include build costs (including contingency; fee); and sales and marketing but the S106 and accessibility standards costs identified have not been included in the calculation.
- 2 There is a lack of transparency in s106 costs. No breakdown of costs included within the S106 allowance for the site is provided in the Viability Assessment. The Council's evidence needs to demonstrate, in a transparent way, how all of the policy requirements within the draft plan have been factored into the Assessment on an item by item basis, including relevant infrastructure requirements, such as the requirement for establishment or connection to decentralised energy systems in Policy ENV7.

8.41 Story considers that it is important to bring these concerns to the Council's attention at this early stage so that these matters are resolved in a collaborative manner between the parties to facilitate the delivery of the Culcheth site. Story requests that the Council takes further advice in order to revise and supplement its evidence base, ensuring that that policy costs applied are realistic, deliverable, and evidenced in accordance with the Framework and Practice Guidance.

# **Appendix 1 West Lancashire Local Plan Policy RS6**

## Chapter 7 Providing for Housing and Residential Accommodation

**7.59** Although so-called temporary accommodation will not require planning permission, in most cases permission will be required. Operators should always check with the Council's Planning Department, but normally planning permission is required in the following circumstances:

- if the work will be held for longer than a normal planting, growing, or picking season;
- if conventional other flat buildings (e.g. caravans and trailers) are to be kept on site permanently;
- if changing of use to an existing building is involved; or
- if the following and permanent services (e.g. water supply or septic tank) need to be constructed.

**7.60** The Council wishes to assist in supporting a healthy rural economy within the context of national and local planning policies. Permanent buildings or caravans which are kept on site for a number of months can reduce the open character of the Green Belt and have a negative impact on the landscape and the amenity of local residents. Therefore, the above policy has been introduced to limit the impact of this type of development on the local area.

**7.61** The Council has also produced Supplementary Planning Guidance on Accommodation for Temporary Agricultural Workers, which is relevant to the implementation of this policy.

### Other Local Planning Policy and supporting documents

- Accommodation for Temporary Agricultural Workers SPG (2007)

## 7.6 Policy RS6: A "Plan B" for Housing Delivery in the Local Plan

### Context

**7.62** Policy GN2 sets out several sites across the Borough that are identified for development for the needs of a "Plan B", should it be required. Appendix E sets out the key issues in relation to delivery and risk for each individual policy. For Policies SP1 and RS1, the delivery issues often revolve around a similar concern – what if a key site or location for residential development cannot be delivered? Ultimately, this is the overall outcome of the locally-delivered target for residential development not being met, unless a viable alternative can be found.

**7.63** Therefore, whilst it is hoped that all aspects of the Local Plan will be deliverable, and the above provisions included because the Council believes that they are, it is prudent to have a "Plan B" prepared in case a key site(s) for residential development does not come forward during the plan period. Policy RS6 provides the Council with the ability to monitor whether "Plan B" should be considered through monitoring that the Local Plan's residential target is not being met.

**7.64** An additional consideration is the fact that the Local Plan covers a long period (15 years) and, in relation to the locally-delivered targets, it is not unreasonable to expect to change in the medium term for those targets over the 15 years, potentially resulting in new targets. Therefore, the Local Plan should be flexible enough to deal with change, which will involve monitoring and change in circumstances, without a wholesale review of the Plan.

### Policy RS6

#### A "Plan B" for Housing Delivery in the Local Plan

The "Plan B" sites safeguarded in Policy GN2 will only be considered for release for housing development if one of the following triggers is met:

- Year 5 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 5 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- Year 10 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 10 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- The housing target increasing as a result of new evidence

If, at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from that safeguarded from development for "Plan B" to make up the extra land supply required to meet the new housing target for the remainder of the Plan period.

### Justification

**7.65** The Council believe that the locally-determined targets that have been set in this Local Plan are fair and reasonable in light of all the available evidence at this time. However, it is possible that targets for residential development will rise, meaning that new locations for development would need to be identified, and so in this situation the "Plan B" would also provide the flexibility required to accommodate this rise.

**7.66** In essence, the Council's "Plan B" for the Local Plan involves the release of land from the Green Belt and its allocation as safeguarded land under Policy GN2. This land would be safeguarded from development until the above triggers in Policy RS6 are reached. Until these triggers are reached the land will be protected from development in a similar way to Green Belt (see Policy GN2) and in such a way as to not prejudice the possible future development of this land if the "Plan B" is triggered.

## Chapter 7 Providing for Housing and Residential Accommodation

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**7.67** The supply of land safeguarded for medium development under the “Plan B” in Policy GN2 (which has a total capacity of 83 dwellings) is more than sufficient to allow for at least 15% extra to provide the 15-year housing target being proposed in the Local Plan (15% of 4,860 dwellings = 729 dwellings). This percentage is based on the assumption that even the largest of the housing allocations in the Local Plan is covered by the flexibility of the “Plan B”, should it fail to be delivered.

**7.68** Ongoing monitoring of housing delivery in the Plan period will enable the Council to be prepared for a trigger point in Policy RS6 being reached. If it is anticipated that a housing trigger point is reached (i.e. at the end of Years 4 and 9 of the Plan) that housing delivery is at risk of triggering the “Plan B”, the Council will commence a review of the level of affordable housing supply compared to housing requirements. This review will also review the “Plan B” sites themselves in order to identify which site(s) are most suitable to release for development at that time (i.e. depending on the nature, area, size, and the housing supply), should the level of affordable housing supply ultimately trigger the “Plan B” in April of the following year. The quantum of release will be sufficient to meet the identified shortfall in housing delivery compared to the housing requirements.

## **Appendix 2 Land at Warrington Road, Culcheth**





Parcel 1

Parcel 2

A674

B5212

Halerof Ln

Clarke Ave

Warrington Ave

Warrington Rd

## **Appendix 3 Allocation Masterplan**



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*land South Of Warrnq on Road, Culcheth*  
**Masterplan**

## **Appendix 4 HSE Response**

**By e mail:**

Rosie Peniston,  
Story Homes Ltd  
Acklehurst Business Park,  
Foxhole Rd, Chorley,  
Lancashire,  
PR7 1NY.

HSE Ref: D830

Date: 16 June 2017

Dear Ms Peniston,

**Pre Application Advice Ref D830 : HSE pre-application advice on proposed development at Warrington Rd, Culcheth resulting from HSE's re-assessment of the adjacent area of thick walled pipeline (15 Feeder Crank / Warrington).**

1. Thank you for your request for pre-application advice relating to the proposed development at Warrington Rd, Culcheth.
2. Your initial request involved the reassessment of the risks from a section of major accident hazard pipeline, Transco ref. 1038 operated by National Grid Gas, for which you forwarded a revised pipeline specification and grid references as supplied by National Grid Gas. My colleague Mr D Hill then provided you with an assessment report including a site plan showing the revised HSE Consultation Distances (CD's) in relation to your proposed development site. Further to this work you requested HSE's pre-application advice on the proposed developments, as shown in drawing DWG: 019-01Sheet supplied, in light of this reassessment.

Science Directorate

**Jonathan Statham**

Land Use Planning  
HSE  
Harpur Hill  
Buxton  
Derbyshire  
SK17 9JN

Tel: 01298 218159

Lupenquiries@hsl.gsi.gov.uk

<http://www.hse.gov.uk/>

Head of Team  
Stuart Reston

## **HSE pre-application advice based on the enhanced pipeline specification.**

3. Drawing DWG: 019-01Sheet shows that the proposed development is for housing. The proposed scale of development results in this being defined as a sensitivity level 3 development. HSE's reassessment of the enhanced section of the pipeline shows that in the vicinity of the proposed development site the HSE inner and middle consultation distances are both reduced to 3m either side of the pipeline centreline. Drawing DWG: 019-01Sheet shows this area of pipeline routing unpopulated with housing and used as a public footpath. The plan appears to show that the housing is situated in the outer HSE consultation zone, and as such HSE would not advise against this type of development in this location. HSE would not advise against the positioning of the footpath within the inner or middle consultation distance.
4. Based on the revised consultation zones, which, result from the reassessment of the thick-walled pipeline, as specified in our associated pipeline reassessment, and the location of the pipeline and corresponding housing development; **HSE would not advise, on safety grounds, against the granting of planning permission for the proposed development.**
5. This advice is based on the information which you have provided about this pre-planning application and HSE's existing policy for providing land-use planning advice, and is the response which HSE would provide should the development proposal be submitted for formal consultation in its present form. However, HSE's advice in response to a subsequent application may differ should HSE's policy, or the development details have changed by the time the application is submitted.
6. HSE has provided planning authorities with access to the HSE Planning Advice Web App, an online software decision support tool, to consult HSE on planning applications. However, in this case, because the proposal lies in the vicinity of a major accident hazard pipeline for which the pipeline has been thick-walled in sections, Warrington Borough Council should consult HSE directly for advice as the HSE Planning Advice Web App cannot currently take into account any modifications which have been made, to a pipeline since its original notification.

Yours sincerely

Jonathan Statham

**Land Use Planning Advice Team**

**Science Directorate**

Enc.

Drawing DWG: 019-01Sheet



**MASTERPLAN**  
 LAND SOUTH OF WARRINGTON ROAD, CULCHETH

**NOTES:**

1. The site is bounded to the north by Warrington Road, to the east by Culcheth Road, to the south by the A580, and to the west by the A580.
2. The site is divided into two main sections: a residential area to the north and a commercial area to the south.
3. The residential area is divided into two main sections: a residential area to the north and a residential area to the south.
4. The commercial area is divided into two main sections: a commercial area to the north and a commercial area to the south.
5. The site is bounded to the north by Warrington Road, to the east by Culcheth Road, to the south by the A580, and to the west by the A580.
6. The site is divided into two main sections: a residential area to the north and a commercial area to the south.
7. The residential area is divided into two main sections: a residential area to the north and a residential area to the south.
8. The commercial area is divided into two main sections: a commercial area to the north and a commercial area to the south.
9. The site is bounded to the north by Warrington Road, to the east by Culcheth Road, to the south by the A580, and to the west by the A580.
10. The site is divided into two main sections: a residential area to the north and a commercial area to the south.







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# WARRINGTON ROAD, CULCHETH

VISION DOCUMENT, SEPTEMBER 2017







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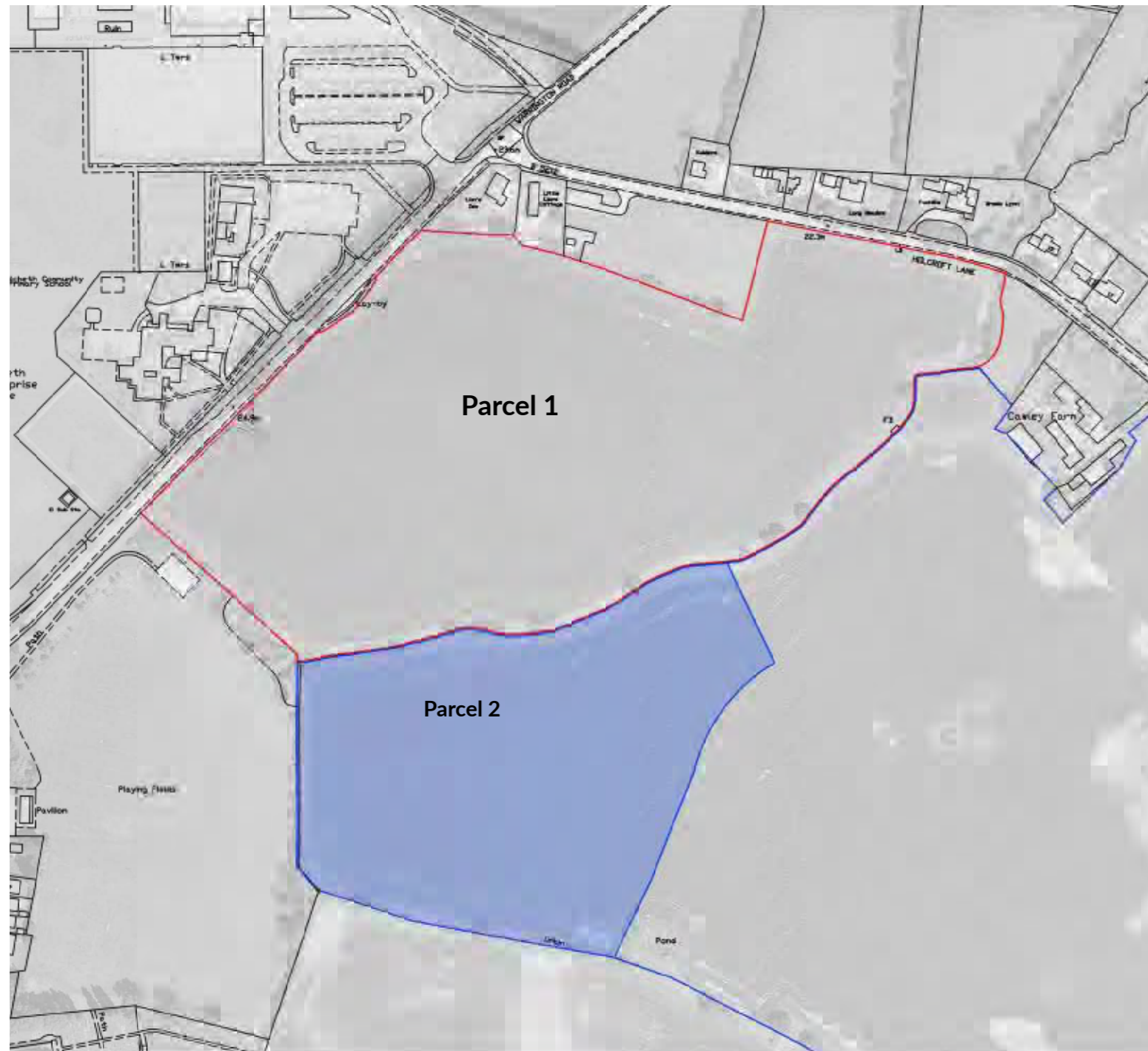
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# 01 INTRODUCTION



The Site is shown within the red line above (Parcel 1). The land edged in blue (Parcel 2) is in the same ownership and could also be included in order to meet all of Culcheth's housing needs on one site.

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This Vision Document has been prepared by Story Homes North West to set out the vision for a new sustainable extension to Culcheth, in Warrington. It sets out the case for releasing land at Warrington Road ('the Site') from the Green Belt and allocating it for housing, as part of Warrington Borough Council's Local Plan Review. It demonstrates that this can provide a sustainable solution to help Warrington Borough Council meet its future housing growth requirements.

To ensure the appropriate development of the Site, Story Homes has instructed a development team with a proven track record in delivering successful schemes. This includes WYG (Planning, Landscape and Visual Impact) Woodcroft (Design) and Croft Transport Solutions (Highways).

This document has taken account of key technical considerations including accessibility, landscape and visual impact to inform the preparation of a Concept Masterplan that demonstrates the suitability of the Site for residential development.

At the outset, it is highlighted that the Site:

- Is in a highly sustainable location in close proximity to the existing services and facilities within the village centre
- Will result in a relatively minimal harm to the key purposes of the Green Belt; and
- Provides an opportunity to create a high quality development which is sympathetic and responsive to the existing settlement character of Culcheth

This document is submitted to the Council alongside the representations to the Warrington Local Plan Preferred Option consultation (September 2017) produced by WYG, and builds on the earlier Scoping stage consultation. Both of these representations should be read in conjunction with this Vision Document.

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# INTRODUCTION TO STORY HOMES



Story Homes is a privately owned housebuilder, founded by Fred Story in 1987. It has a long and successful reputation of building quality and high specification homes across the North of England and South of Scotland. The family owned business has grown in size and status over the years but remains grounded, built on its original ethos of 'doing the right thing' and creating a brand synonymous with quality.

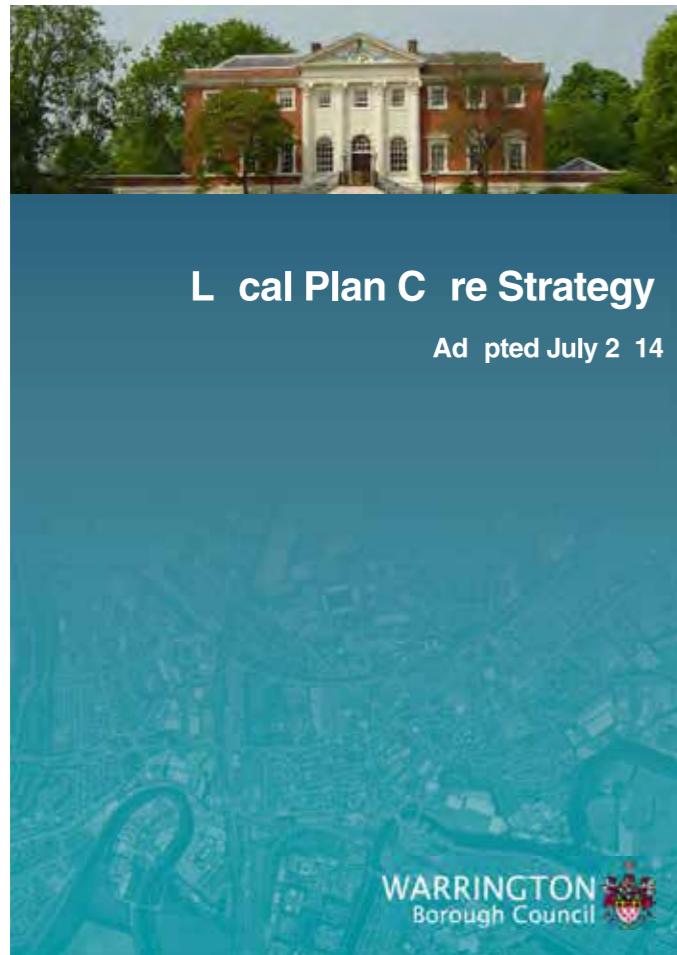
For nearly 30 years Story Homes has been the name most often associated with aspirational homes for sale throughout Cumbria, the North East and Lancashire. A passion for quality and excellence has seen Story Homes become a multi-award winning UK property developer; with modern and attractive homes instantly inspiring buyers. Story Homes have been awarded the top '5 star' rating in the house building industry's annual customer satisfaction survey for the 4th year running since becoming eligible for 4 years ago.

Story Homes' success is underpinned by a determination to understand the needs of communities where we build and a goal to deliver design quality and high quality building specifications that enhance locations. Story Homes' presence in the North West is growing significantly and has recently been awarded 3 UK Property awards for Brookwood Park in Kirkham, The Woodlands in Shotley Bridge and Pentland Reach in Biggar.

The Story Difference – comprising a commitment to design quality, place-making and customer experience – will be instrumental in delivering an exemplary new development which Culcheth can be proud of.

# 02 THE PLANNING CONTEXT

## THE EMERGING WARRINGTON LOCAL PLAN REVIEW



Warrington Borough Council adopted its Local Plan Core Strategy in July 2014. This set out a need to build 500 new homes every year up to 2027. This requirement is now out of date.

Following the adoption of the Core Strategy, a High Court Challenge subsequently quashed the specific parts of the Plan relating to:

- The housing target of 10,500 new homes (equating to 500 per year) between 2006 and 2027 and;
- References to 1,100 new homes at the Omega Strategic Proposal

Given the results of the High Court challenge and the emerging evidence underpinning the Borough's growth needs and economic development ambitions, the Council recognised the need to undertake a review of the Local Plan.

Local Plan Scoping stage consultation was undertaken in November 2016. The Council then published their Preferred Development Option for consultation in July 2017. This sets out the current housing and employment land requirement for the Borough and the preferred option strategy for meeting these needs.

To underpin the Local Plan review, the Council commenced the preparation of the Borough's housing and economic needs to the year 2037. The most up to date study assessing the housing objectively assessed need (OAN) for the Borough identified a need of 955 new homes per year to 2037.

The Council has also assessed the number of additional jobs that will be created through the Council's growth aspirations set out in the 'Warrington Means Business' economic development programme as well as the Local Enterprise Partnership's (LEP) Strategic Economic Plan and future growth ambitions. These growth aspirations will deliver 31,000 new jobs in Warrington up to 2040 which is approximately 30% above the baseline forecasts and there is a need to ensure a balance between the number of homes and jobs.

There is also a need to provide an additional 5% buffer to allow for flexibility (as directed by the National Planning Policy Framework) and to make up for an existing backlog of 847 homes. All of this means that it will now be necessary to increase the minimum supply of homes to around **1,200 per annum**. The Council are also seeking to identify 'safeguarded land' to meet further needs in the ten years beyond the Plan period.

The most recent Strategic Housing Land Availability Assessment (SHLAA), published in January 2016 has identified that Warrington's housing needs cannot be met on brownfield land, existing commitments and on greenfield sites outside of the Green Belt.

If Warrington is to meet its development needs, then based on the Preferred Development Option, sufficient Green Belt land will need to be released to deliver approximately 9,000 new homes and 213 hectares of employment land over the next 20 years [from Preferred Development Option, WBC, July 2017].



# WARRINGTON PREFERRED DEVELOPMENT OPTION

The Council have sought to deliver as much housing as possible within the urban area. They commissioned an Urban Capacity Study which estimated that 15,429 homes could be delivered on existing urban sites, a figure which we feel is unrealistically high and is open to challenge. However, the Council nevertheless maintain that they will need to release sufficient Green Belt land to deliver 8,791 homes (see Table 1).

The Preferred Development Option is Option 2. This is for the majority of Green Belt release to be adjacent to the main urban area in Warrington, with incremental growth in the outlying settlements. This includes a Garden City Suburb of approximately 6,000 new homes to the south-east of Warrington and an urban extension in South-West Warrington of around 2,000 homes.

The outlying settlements have been identified as having an indicative capacity for 1,190 new homes on land to be released from the Green Belt, of which 300 would be in Culcheth (see Table 22). The Green Belt Assessment has assessed all suitable sites immediately adjacent to the existing built-up area of Culcheth and it assessed the Site as making a 'weak' contribution to the Green Belt, meaning that it is one of the most favourable Green Belt sites in Culcheth for development. It will therefore be necessary to release land that makes a 'moderate' contribution to the Green Belt in Culcheth. This corresponds with the 'incremental growth' option assessed in WBC's Settlement Profile for Culcheth, which concludes that this level of growth is likely to be supported by existing and enhanced infrastructure.

This represents very clear "exceptional circumstances" to justify the release of land from the Green Belt. The Site at Warrington Road in Culcheth has the potential to make a substantial contribution to the social and economic success of the Borough.

	955 p.a.	1,113 p.a.	1,332 p.a.
Housing Target 2017 to 2037	19,100	22,260	26,640
Flexibility at 5%	955	1,113	1,332
Backlog (from 2015 against OAN)	847	847	847
Total Requirement	20,902	24,220	28,819
Total Capacity within urban area	15,429	15,429	15,429
Green Belt requirement	5,473	8,791	13,390

Table 1: Housing Land Requirements

Settlement	Indicative Green Belt Capacity
Lymm	500
Culcheth	300
Burtonwood	150
Winwick	90
Croft	60
Glazebury	50
Hollins Green	40
<b>TOTAL</b>	<b>1,190</b>

Table 22: Outlying Settlements - Indicative Green Belt Capacity

Tables extracted from Preferred Development Option, WBC, July 2017

# 03 THE SITE

## LOCATION AND OWNERSHIP

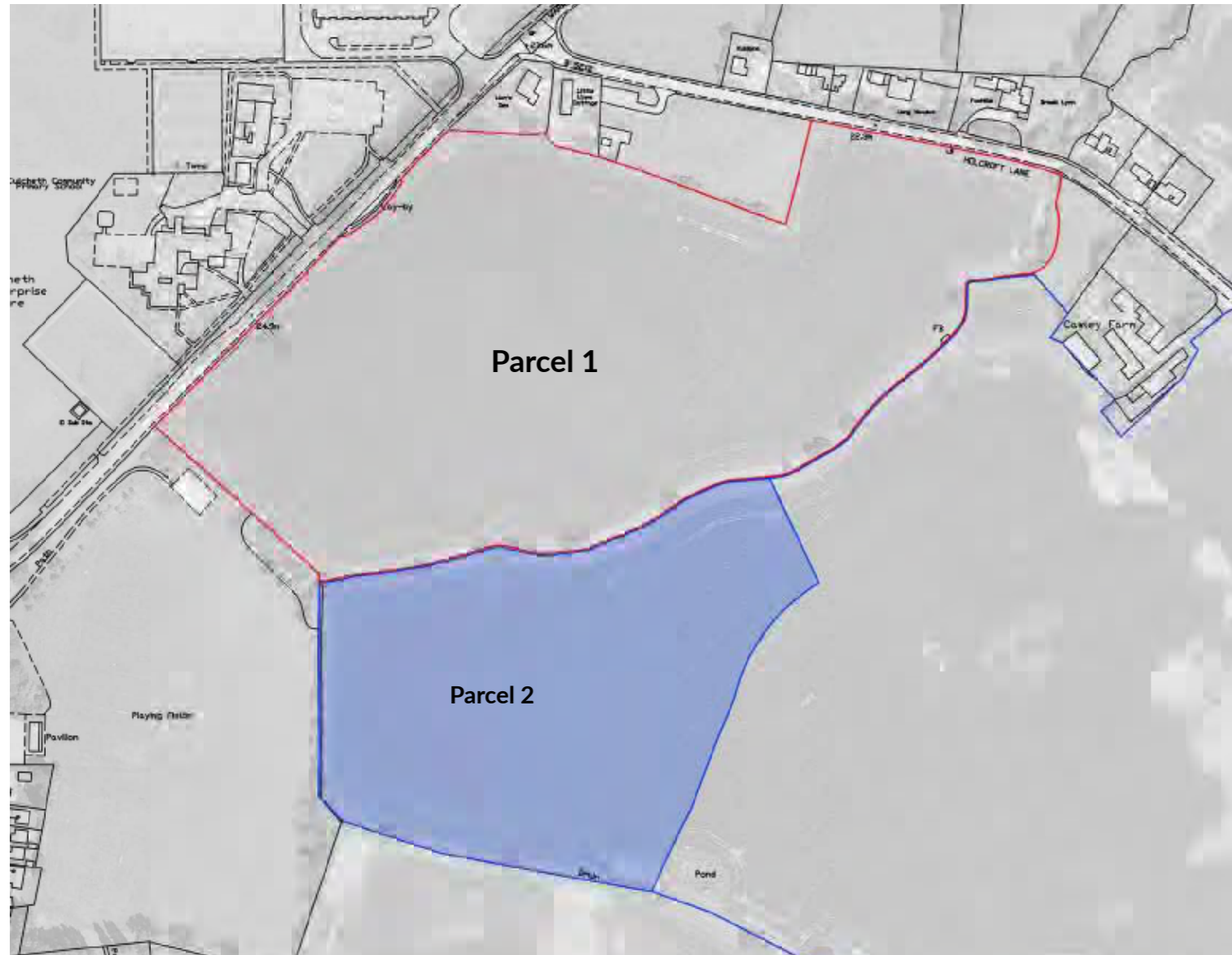


Figure 1 - Site Boundary

The Site is within a single ownership and is represented by a property agent. Story Homes have an agreement with the landowner to bring the Site forward for residential development (subject to its release from Green Belt). There are no legal or ownership constraints to its delivery for housing.

Story Homes are committed to bringing this site forward for housing and will progress a scheme as soon as the Site is allocated.

### Site Location

The Site is located on the eastern edge of the Culcheth village and is currently used as arable farmland. The Site is an irregular shape with its north-western boundary aligned with the Warrington Road / A574. Beyond Warrington Road to the west is the education complex made up of Culcheth Community Primary School, Culcheth High School and Culcheth Community Campus. The residential area of Culcheth village is situated beyond this to the west. Holcroft Lane runs along a section of the northern boundary which has scattered dwellings located along it on the northern side of the road opposite the Site. At the junction of Holcroft Lane and Warrington Road adjoining the Site's northern boundary is the Little Lions Cattery. The south-eastern boundary of Parcel 1 is made of a ditch that passes north east to south west. A rural landscape of small to medium sized arable fields interspersed with residential areas is located to the north, east and south of the Site.

### Parcel 1 & 2

Please refer to Figure 1 to identify the site location, we refer to the Site as 'Parcel 1' which measures approximately 7.08 ha (17.5 acres) We consider the land at Warrington Road in Culcheth to be a sustainable site which can make a significant positive contribution to helping meet Warrington's housing need. The representation is being made therefore to support the growth of Culcheth as a larger outlying settlement of Warrington with the delivery of new housing to meet its needs, and with the retention of Green Belt land where appropriate. We consider the land at Warrington Road to be the most suitable and sustainable site for Culcheth to meet its housing needs. We therefore propose the release of this site from the Green Belt and its allocation for housing. Story Homes would also like to submit additional land referred to as 'Parcel 2' and within the same ownership to the Council as available, suitable and deliverable.

The combined parcel's extending to a total of 11.53ha (28.49 acres) provide the opportunity for the entirety of Culcheth's housing needs to be met in one location maximising community benefits that can be delivered as part of a wider scheme.

Figure 1 therefore shows the principal Site (referred to as 'Parcel 1) as the land edged red. The additional land, 'Parcel 2' is shown edged blue and measures approximately 4.45 ha (11 acres).

It is worth noting that this representation deals principally with the Site edged red in Figure 1 referred to as 'Parcel 1'. We do however discuss the merits of the potential inclusion of 'Parcel 2' for the Council to consider but we ask that the Council consider the sites independently for the purpose of this response.

# 04 GREEN BELT ASSESSMENT

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Warrington Borough Council have undertaken a Green Belt Assessment. The Site at Warrington Road in Culcheth represents the majority of parcel CH9, which is assessed overall as making a 'weak' contribution to the Green Belt. We agree with this analysis. Culcheth has 15 land parcels within the assessment: three of these (including CH9) are rated as making a 'weak' contribution; with the remaining twelve all rated as making a 'strong' contribution. This therefore means that the Site is amongst the most favourable for development in terms of assessing impacts on the Green Belt, we consider later in this document why this is.

The Site sits to the immediate east of the existing village in a triangle of land between Warrington Road and Holcroft Lane. A watercourse forms the south-eastern boundary of Parcel 1. There are mature trees and hedgerows along most of the Warrington Road frontage and a mature tree belt lies alongside the watercourse. This development would therefore represent a small but well screened extension to the village on its eastern edge. Impact on the openness of the surrounding Green Belt and on surrounding landscape character but be limited by the defensible edges of the Site.

The other sites put forward in the Call for Sites exercise generally represent larger scale incursions into the surrounding countryside and would have greater impact on the surrounding landscape character and Green Belt. This includes the large expanse of land to the north-east of the village (R18/128) which would represent an approximately 50% expansion in the size of the built-up area and lacks defensible boundaries. Other sites are completely divorced from the built-up area. This is reflected in the Green Belt Assessment, which assesses all of these other sites as being in land that makes a 'strong contribution' to the Green Belt. The only exception is site R19/041, to the south-west of the village.

The subject land at Warrington Road is therefore the best option in terms of impact on the surrounding landscape and the only option for the growth of Culcheth without requiring land that makes a strong contribution to the Green Belt.



# 05 SUSTAINABILITY

We have undertaken analysis of the location of key community facilities in Culcheth and their accessibility from the subject Site (see the Facilities Plan).

This analysis shows that the Site is very well located with most key facilities lying within easy walking distance. Culcheth is a sustainable centre with a wide range of facilities, including a high school, GP surgery, leisure centre and food store. This makes the Site sustainable; there will be not be a reliance on the private car and most journeys can be made on foot.

The Site is especially well sited in relation to education needs, with both the high school and primary school lying on the opposite side of Warrington Road, within a five minute walk. Both of these schools also serve as wider community hubs – with a day nursery and children’s dentist being located alongside the primary school; and the leisure centre alongside the high school.

The Site is also well served by buses: the no.19 service runs along Warrington Road, with buses every 30 minutes to Warrington. There is a bus stop on the northern boundary and several bus stops within 5 minutes’ walk of the Site. Taylor Business Park offers a significant number of jobs, lying a short distance to the south of Culcheth, and is accessible by cycle or buses via Warrington Road.



Service	Route	Daytime	Evening	Sat	Sun
19	Leigh - Warrington	2	1	1	1
28	Leigh - Warrington	1	1	1	0
28A	Leigh - Warrington	5 per day	0	0	1
193	Birchwood - Glazebury	1	1	0	0

**Table 1 – Summary of Bus Services Operating Past The Site**

Site R18/041 is similarly accessible to the village centre but is much further from the high school and from the regular bus service on Warrington Road. Significantly, this Site lies to the rear of existing houses on residential streets; it lacks the strong vehicle and pedestrian connections with the existing settlement that the subject Site offers.

The Site compares favourably against other potential sites from the Call for Sites exercise in terms of sustainability. No other parcel of land put forward can compete with the Site in terms of accessibility to both the village centre and the services hub around the two schools.



# FACILITIES PLAN



- Site boundary
- Culcheth Village Centre
- 🚌 Bus stop
- Bus route
- 🛒 Food store
- 🎓 High school
- 🏠 Primary school
- 👶 Nursery
- ⚕️ GP
- 🏪 Pharmacy
- 🦷 Dentist
- ✉️ Post office
- 📖 Library
- 🍷 Public house
- ⛪ Church
- 🏃 Sports facilities
- 400m (5 minute walk)
- 800m (10 minute walk)

# 06 CONSTRAINTS AND OPPORTUNITIES



EA Flood Map for Culcheth Source: Environment Agency – downloaded 25/09/2017

The Site is not subject to or near to any restrictive environmental designations. There are no technical or environmental constraints which present an obstacle to development.

## Consultation Distances

Story Homes have engaged with National Grid and the Health and Safety Executive (HSE) as part of their technical due diligence investigations. Although the Site sits within consultation distances for the National High Pressure Gas Pipeline that runs in a south to north-east direction across the Site, our investigations have demonstrated that the Council's policy map has not been updated to take account of upgrades to the pipeline's specification in recent years.

National Grid, the pipeline operator, has informed Story Homes that the pipeline has been heavy brick walled reducing the risks of the accident hazard pipeline. Story Homes have taken this information to the HSE and have had the pipeline specification re-modelled to understand how heavy brick walling reduces the size of the required consultation distances. It has been demonstrated that this reduces the inner and middle consultation distances to 3 metres either side of the pipeline and that the outer consultation distance is now within 310 metres. Further to the reassessment, Story Homes have prepared the illustrative masterplan which shows the inner/middle consultation zones unpopulated with housing and used as a public footpath. The plan shows that the housing is situated in the outer HSE consultation zone and in accordance with the HSE 'Land use and planning methodology' the proposed development is defined as sensitivity level 3. HSE have prepared a bespoke letter to Story Homes which concludes: "HSE would not advise, on safety grounds against the granting of planning permission for the proposed development".

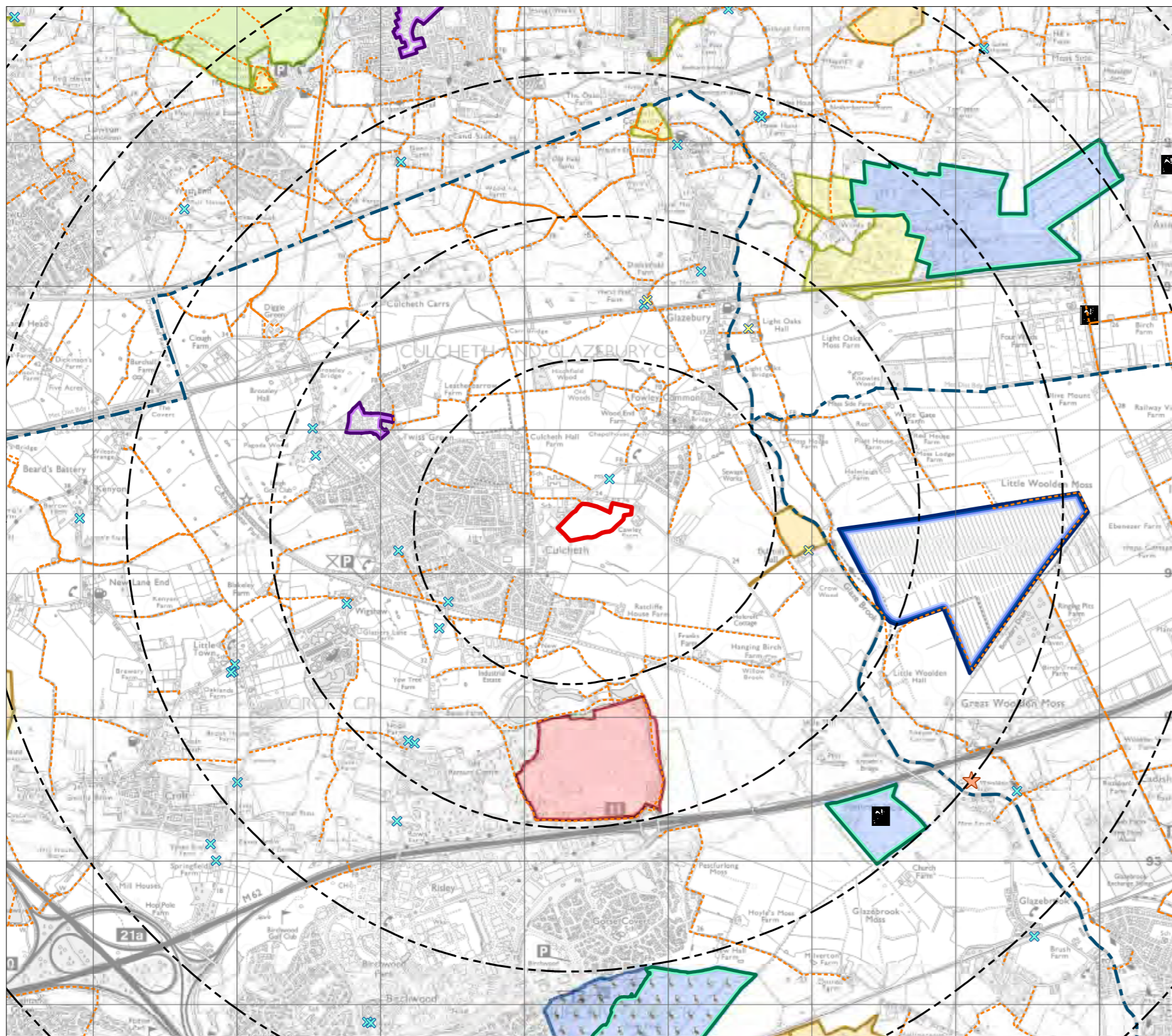
## Flooding and Drainage



















The entirety of the Site is located within flood zone 1 of the Environment Agency's Indicative Flood Map which means that it is considered to have a low risk of flooding. Initial investigations have indicated that Site drainage can be achieved via an appropriately designed Sustainable Urban Drainage System (SuDS).

## Ecology and Trees

The Site is not recognised for its biodiversity value. It is not subject to any ecological designations, such as SSSI's, SBI's or Local Nature Reserves, and there are no such designations nearby. At planning application stage, detailed surveys of the flora and fauna will be undertaken to ensure that there will be no harm to any high value species. There are opportunities to improve biodiversity at the Site through the provision of enhanced habitats, including new green space. Given that the Site is currently used for agriculture, it contains very few trees. All existing high value trees and hedgerows will be retained wherever possible alongside significant new tree planting, to enhance the character of the new development. Overall there will be an increase in the number of trees at the Site.

# LOCAL LANDSCAPE



-  Preliminary Site Boundary
-  1km buffers from site boundary
-  Unitary Authority boundaries
- Landscape Designations :**
-  Country Parks
-  Authorised Landfill Sites
-  Authorised Landfill Sites (Current status and usage to be confirmed)
- Public Access :**
-  Public Footpaths
-  Public Bridleways
-  CROW Access Land exc Section 15
- Heritage Designations :**
-  Conservation Areas
-  Scheduled Monuments
- Listed Buildings
-  Grade II\*
-  Grade II
- Biodiversity Designations :**
-  Special Areas of Conservation
-  Sites of Special Scientific Interest
-  Local Nature Reserves
-  'Cadishead and Little Woollen Moss' Wildlife Trust Nature Reserve
-  Wildlife Trust Reserve

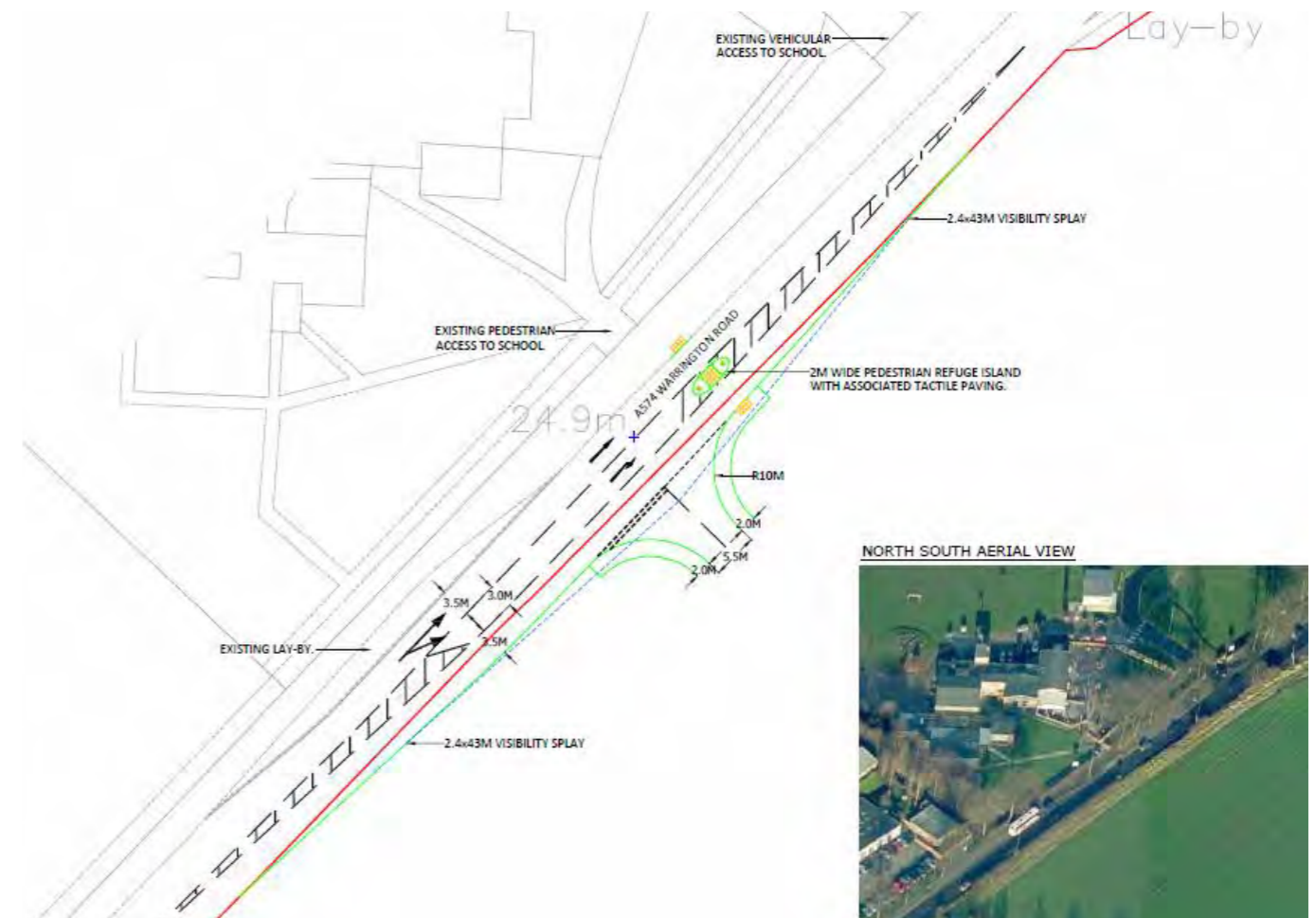
# CONSTRAINTS AND OPPORTUNITIES

## Highways

A detailed appraisal of the highway network and access constraints and opportunities has been undertaken by Croft Transport Solutions. Vehicular access to the Site can be achieved both off Warrington Road and from Holcroft Lane. It is proposed to serve the Site through a primary and secondary access solution.

The main vehicular access located on Warrington Road can accommodate a formal priority junction arrangement with standard geometric parameters for residential developments with a 5.5 metres wide carriageway, footway on both sides of 2 metres wide and 6 metre radii. Sufficient visibility can be achieved in both directions of at least 2.4 metres by 43 metres which ensures it complies with the guidance in Manual for Streets and Manual for Streets 2. All of this geometry can be accommodated within either the Site boundary or within the current limits of adopted highway. This junction has been shown on Drawing Number PROP-CULCHETH-F01 and demonstrates that the proposed vehicular access can be adequately accommodated. If Parcel 2 is required to assist in the delivery of additional housing and community facilities, the number of units the currently proposed access could serve in excess of the 300 units proposed for Culcheth. Furthermore, if a secondary access were to be provided along either the Warrington Road or the Holcroft Lane frontages then this would clearly allow the potential for a much higher number of units, subject to the standard junction capacity analyses for the two site access points and the surrounding highway network.

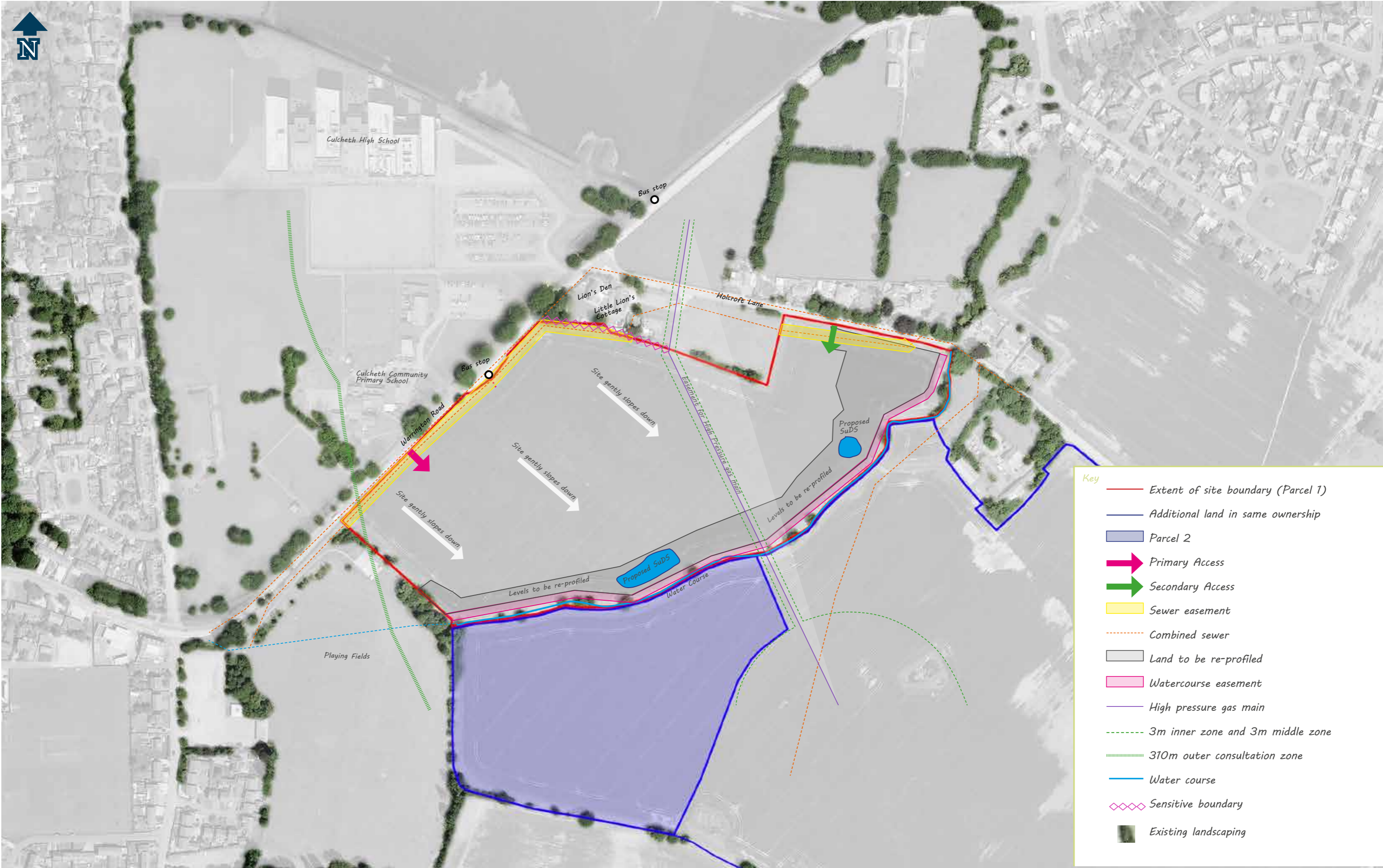
The frontage of the proposed Site along Warrington Road provides for a comprehensive highway strategy to be facilitated in this area, entirely within the adopted highway and Story Homes controlled land. Story Homes would welcome discussions with the Councils highways and transport department as soon practically possible. In terms of off-site impact the proposals are likely to generate in the region of 130 vehicular trips in the two busiest hours of the day which are likely to be between 0800 and 0900 hours and 1700 to 1800 hours. There are numerous routes for traffic to be dispersed onto the local highway network. There are no particular capacity constraints to the local highway network which would provide an issue for this additional traffic generation and this will be demonstrated in detail within a Transport Assessment that would accompany any formal detailed application for this Site.



Proposed Site Access: PROP-CULCHETH-F01







- Key**
- Extent of site boundary (Parcel 1)
  - Additional land in same ownership
  - Parcel 2
  - ➔ Primary Access
  - ➔ Secondary Access
  - Sewer easement
  - Combined sewer
  - Land to be re-profiled
  - Watercourse easement
  - High pressure gas main
  - 3m inner zone and 3m middle zone
  - 310m outer consultation zone
  - Water course
  - Sensitive boundary
  - 🌳 Existing landscaping

## Constraints & Opportunities

### Warrington Road, Culcheth



Drawing Number: WD17-19-MP02 B  
 Scale: 1:2000  
 Date: August 2017  
 Sheet Size: A2





# 07 THE MASTERPLAN

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Story Homes have prepared a Concept Masterplan for the Site. This responds to the identified opportunities and constraints and shows how the proposed number of houses will be accommodated. The masterplan gives an indication of the look and feel of the proposed development. Two variations of the Concept Masterplan have been prepared for the Site: the first covers Parcel 1 only and the second covers Parcels 1 and 2. The key features of both are described on the following pages.



# MASTERPLAN PARCEL 1



DWG: 019-01

SHEET SIZE: A0

SCALE: 1:1000

**MASTERPLAN**  
LAND SOUTH OF WARRINGTON ROAD, CULCHETH



# MASTERPLAN PRINCIPLES

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- 1** The layout has been designed so that a unique sense of arrival is created immediately upon arriving at the development. Houses will face outwards towards Warrington Road set back behind attractively landscaped green spaces. A vista towards the arrival green has been created providing a welcoming and inviting environment.
- 2** A well connected Arrival Green and nodal area, distinct in character it will help visitors navigate further into the development. This area will be framed by feature dwellings facing onto this important area.
- 3** Courtyard serving higher density plots. Landscaping will soften edges and help delineate public and private realm.
- 4** Small cul-de-sac serves a crescent of houses.
- 5** Central green space creates a distinct and attractive space centrally within the development. It will be highly accessible with good pedestrian and cycle connectivity. It will provide panoramic views into the southern part of the development. Houses will face out onto this important space responding positively with it. Existing high quality trees retained providing a mature landscape setting.
- 6** Houses will face onto the East-West linear green. Soft landscaped nodal area will highlight the junction running south. Existing high quality trees and hedges retained.
- 7** Linear landscaped areas along the southern boundary will provide a soft edge to this important area. Plot positions and orientations will be organic in form, they will face out taking advantage of the long distant views to the south. Lower density plots will respond positively with this rural edge. A new pedestrian route will provide pedestrian permeability connecting the development together. Existing trees and hedges will be retained and enhanced.
- 8** A series of nodal areas around the development will assist in navigation as well as providing attractive areas.
- 9** Landscaped green located at the head of this important route. This area will provide a nodal point helping navigate around the development.
- 10** Houses set back from Warrington Road facing out over a landscaped green wedge responding positively with this highly visible area.
- 11** Landscaped Green will provide an attractive space at the head of the street. It will also provide a buffer between the development and the existing properties to the north. A pedestrian link will connect the development with the wider footpath network around the development.
- 12** Small courtyard serving higher density plot.
- 13** Pedestrian link runs north to south through the development. This area utilises the Gas pipe line easement which runs through the Site.
- 14** Pedestrian route crosses the street. Change in carriage width, colour and texture will help calm vehicle speeds. Only one vehicular crossing over the gas pipe line is permitted, this street layout connects Warrington Road with Holcroft Lane whilst discouraging 'rat running' through the development.
- 15** Arrival green located at the entrance into the development from Holcroft Lane. This area will create a completely different environment from the arrival green serving the Warrington Road access. This will ensure a unique sense of arrival is created from both access points into the development.
- 16** Houses will face onto Holcroft Lane set back behind a landscaped green wedge. Hedge and tree planting will help assimilate the development into the street-scape.

# MASTERPLAN PARCELS 1 & 2



Land South Of Warrington Road, Culcheth

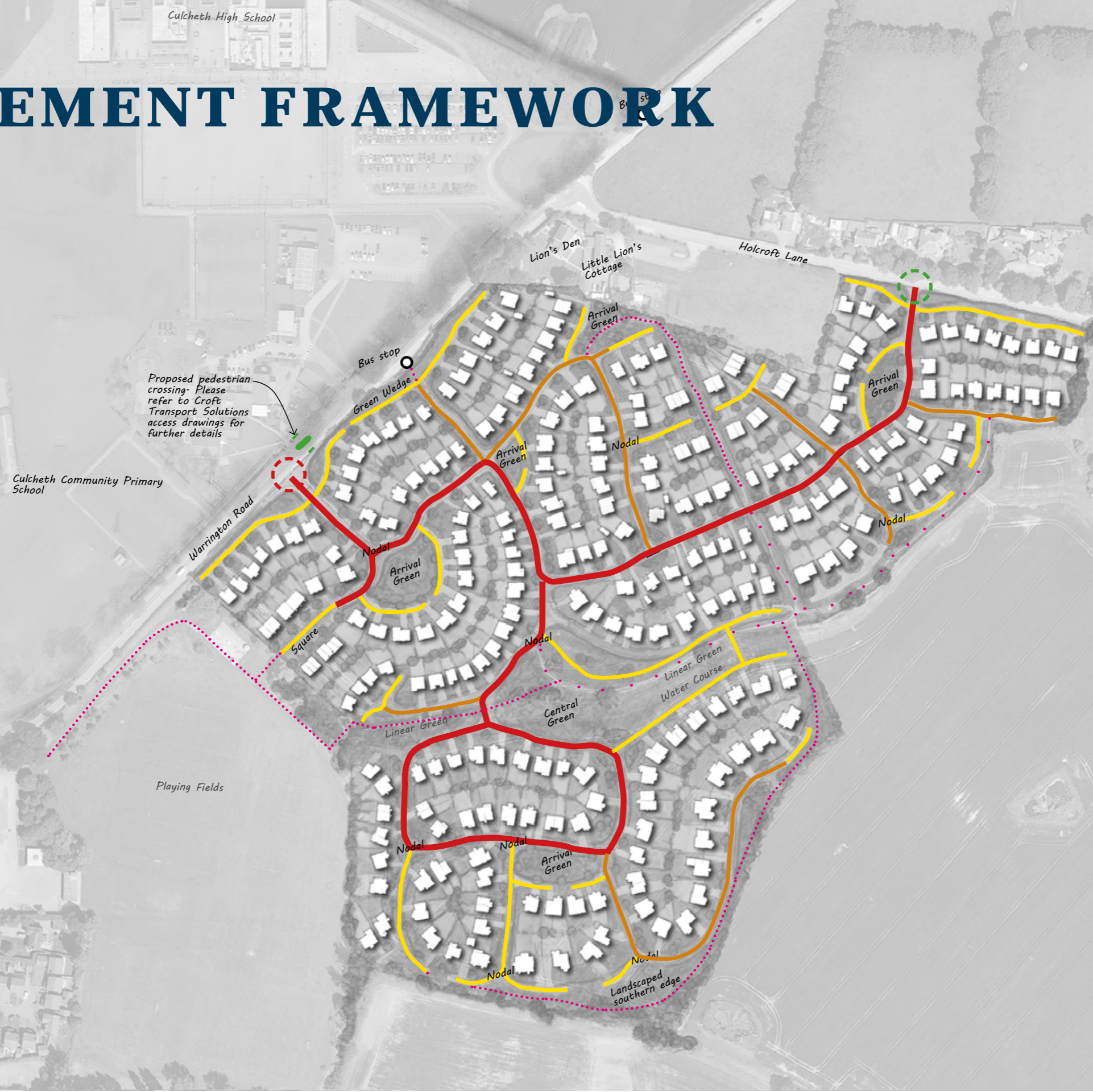
**Masterplan**

# MASTERPLAN PRINCIPLES

- 17 Shared surface street will serve homes overlooking the central green.
- 18 Amenity green will highlight two important junctions serving the most southern parts of the development. Homes will be carefully positioned and orientated around this important space. Soft landscaping will delineate the public and private realm as well as promote a rural setting to this part of the development.
- 19 Large detached houses generously spaced will provide a visually permeable edge to the most southern edge of the development. High quality landscaping and boundary treatments will create a soft edge to the development.
- 20 Enhanced landscaping to the southern edge will soften views into and out of the development.
- 21 Key nodal with possible views out of the development.
- 22 Generously spaced houses in large plots will face out of the development overlooking a multifunctional green space area. Enhanced landscaping will soften this edge of the development.



# MOVEMENT FRAMEWORK



Proposed pedestrian crossing. Please refer to Croft Transport Solutions access drawings for further details

Key	
	Extent of site boundary
	Additional land in same ownership
	Primary Access
	Secondary Access
	Primary movement route
	Secondary movement route
	Tertiary movement route
	Pedestrian/cycle route
	Bus stop

**Movement Framework**  
Warrington Road, Culcheth



Drawing Number: WD17-19-MP03-B  
Scale: 1:2000  
Date: August 2017  
Sheet Size: A2

Drawing Number: WD17-19-MP03-B  
Scale: 1:2000  
Date: August 2017  
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### **Movement Framework**

A primary movement route runs centrally through the development. It connects Warrington Road with Holcroft Lane, however this route has been designed to deter 'rat running' through the development. This route will also allow direct access to individual properties.

A network of secondary and tertiary movement routes branch off the primary and provide vehicular and pedestrian access to individual properties. The secondary and tertiary streets will be designed as high quality shared surface streets to calm vehicle speeds and create a safe pedestrian environment.

A series of nodal areas and green spaces have been carefully positioned around the development. As well as provide attractive spaces, they will help visitors and occupants navigate around the development.

Active frontages along all of the routes ensures a safe and welcoming environment.

### **Pedestrian & Cycle permeability**

There are no existing Public Rights Of Way which cross the Site. The proposals include new pedestrian & cycle only routes, these will connect the green network areas and multi functional green spaces together. They will also connect the development with the wider footpath and cycle networks, encouraging walking, cycling and public transport.

### **Public transport**

There are two bus stops located within close proximity of the Site on Warrington Road. along the northern boundary. These serve bus routes running from and to Warrington Interchange, Leigh bus station and Taylor Business Park.

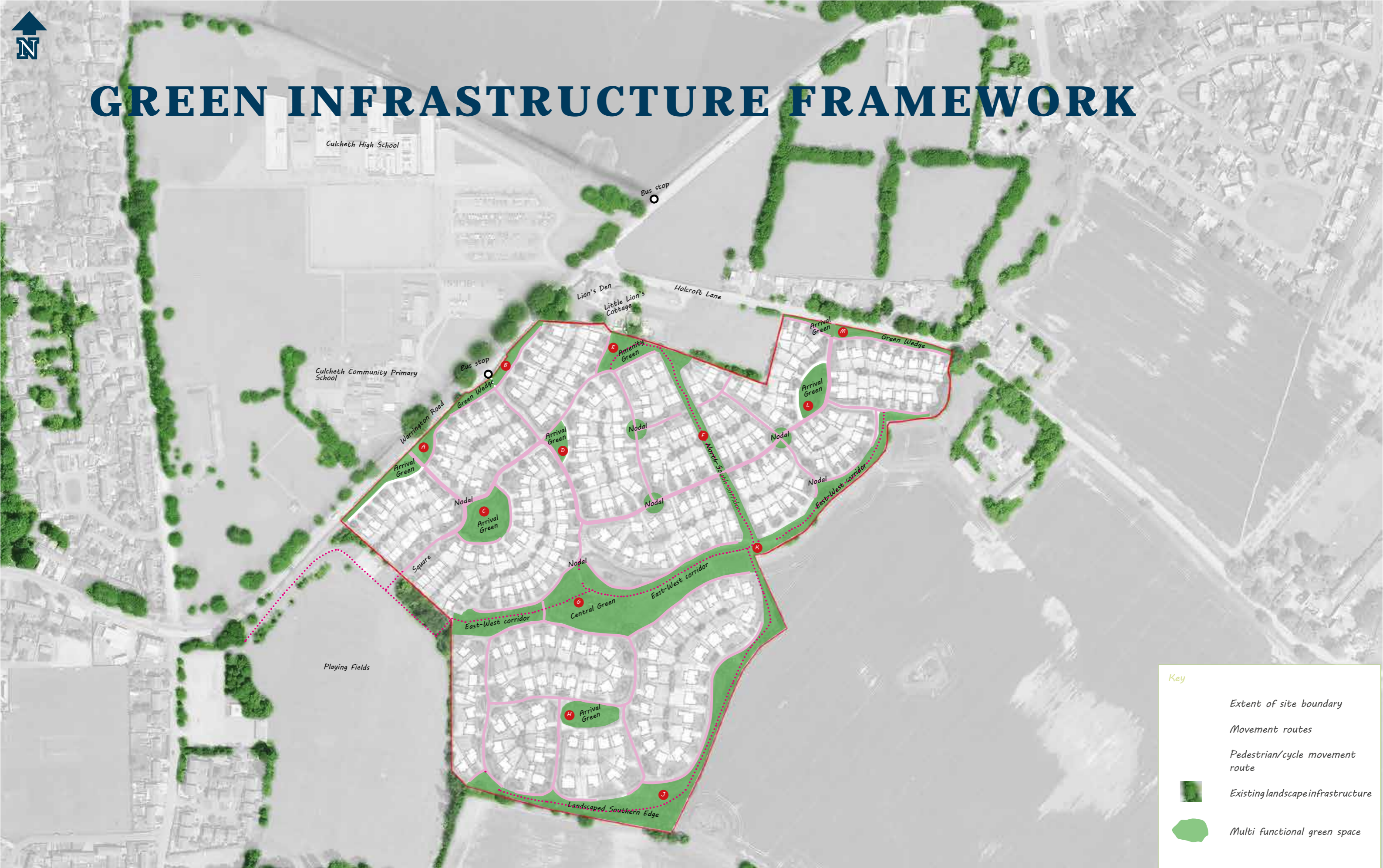
### **Parking Provision**

On site car and cycle parking will be provided in accordance with the relevant parking standards and guidance. Parking provision will be dealt with at the appropriate reserved matters application stage.





# GREEN INFRASTRUCTURE FRAMEWORK



**Key**

-  Extent of site boundary
-  Movement routes
-  Pedestrian/cycle movement route
-  Existing landscape infrastructure
-  Multi functional green space



## Green Infrastructure

Warrington Road, Culcheth

Drawing Number: WD17-19-MP04-B  
 Scale: 1:2000  
 Date: August 2017  
 Sheet Size: A2



urban design | masterplanning | architecture



F - North-South corridor will form an important part of the green network connecting the southern green network areas with the north. This route will be dedicated to pedestrians and cyclists.

G - Central green space creates a distinct and attractive space centrally within the development. It will be highly accessible with good pedestrian and cycle connectivity. Houses will face out onto this important space responding positively with it.

H - Arrival green will act as an important nodal area highlighting two important junctions within the development serving the southern most parts of the development.

J - The landscaped southern edge will provide a soft edge to the development. Lower density houses will face out of the development along this edge.

K - East-West corridor located along the southern boundary. This space will be easily accessible and create an active travel route. It will provide a soft edge to the development.

L - Arrival green located near the Holcroft Lane entrance. The shape and layout of this green space differs from that of the arrival green near the Warrington Road entrance. This will give visitors a completely different experience depending which entrance into the development they use.

M - Holcroft Lane arrival green creates a welcoming environment soft edge to the development.



The Green Infrastructure includes new and existing established green spaces which will thread through and surround the development's built environment. These green spaces will be multi-functional and are positioned on main movement lines to ensure they are well overlooked, usable, accessible and safe. These important spaces will form an integral part of the development and its pedestrian / cycle networks. They will provide attractive and functional spaces, as well as create distinct nodal markers for movement within the development. The design and management of these spaces will provide ecological benefits and help assimilate the development's built environment into the landscape setting.

A - Warrington Road Arrival green located at the gateway into the development.

B - Green wedge will provide a soft edge to the development along Warrington Road.

C - Central Arrival Green, attractively landscaped formal open space area. This will act as an important nodal area within the development. It will create impact upon arrival when entering the Site from Warrington Road.

D - Arrival green located along the main movement route through the development highlighting an important junction.

E - Northern amenity green highlights the entrance into the North-South pedestrian/cycle corridor.

# VISION PRINCIPLES



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The Site (Parcel 1) can accommodate up to 220 high quality family homes comprising a range of 2, 3, 4 and 5 bed homes. The proposed scheme will retain a consistent reference to the character of Culcheth and will embody the key principles of sustainability, promoting healthy lifestyles and a high quality of life through the enhancement of public rights of way and access to safe and multi-functional green spaces. The properties will be generously spaced and softened by a network of green infrastructure where open spaces will function individually, but will together add up to a comprehensive green environment which permeates throughout the development.

The layout has been designed so that a unique sense of arrival is created immediately upon arriving at the scheme. Houses will face outwards towards Warrington Road set back behind attractively landscaped green spaces. A vista towards the arrival green has been created providing a welcoming and inviting environment further connecting to nodal points within the scheme to frame and feature dwellings and assist with navigation.

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# 08 BENEFITS AND INFRASTRUCTURE



In order to justify the release of this Site from the Green Belt the Council must in their plan making demonstrate exceptional circumstances but also ensure that this would constitute sustainable development. The NPPF states that “sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.”

The development of approximately 220-300 new homes on this Site in Culcheth will deliver significant and lasting economic, social and environment benefits to the local community.

## Social Benefits

As part of this development Story Homes will be providing the policy requirement of 30% affordable housing. The exact number of units will be determined through a detailed planning application and led by initial discussions with Warrington Council to determine the local need for social rented and discounted sale homes. This will have significant social benefits for the local community.

In addition to helping WBC meet the housing needs of the borough, the development of the Site will provide significant social, environmental and economic benefits to the local community. The presumption in favour of sustainable development within the NPPF includes social, environmental and economic sustainability.

The provision of new housing (and especially the affordable housing element) is a clear social benefit. The Warrington Local Plan Core Strategy identifies Culcheth as a neighbourhood centre (a ‘larger village centre’) in its Vision (p.72) and in Policy SN4. Objective 72 is to “maintain and enhance centres identified in the retail hierarchy throughout the borough as accessible, key locations for shops, services and community facilities”.

The allocation of the Site for housing will play an important role in contributing to this objective and realising the vision. It will provide an increase to the local catchment population, which will help to support the shops and public services that exist in the village, with potential additional improvements funded through planning contributions. Furthermore, there will be additional economic benefits in terms of construction jobs and training, and additional tax revenues.

## Economic Benefits

The Home Builders Federation have produced a useful tool to estimate the value of these wider economic benefits (<http://www.hbf.co.uk/index.php?id=3197>). For 220 new homes (Parcel 1) this is estimated to:

- Support the employment of 946 people
- Provide 8 apprentices, graduates or trainees
- Generate £2,200,000 in tax revenue, including £282,920 in Council Tax revenue.
- New Homes Bonus – 220 new homes will result in a New Homes Bonus payment of £1.9m.

If the scheme were to include Parcel 2, there is the potential for the wider site to deliver 300 homes in this location Using the HBF tool this is estimated to:

- Support the employment of 1,290 people
- Provide 12 apprentices, graduates or trainees
- Generate £3,000,000 in tax revenue, including £385,800 in Council Tax revenue.
- New Homes Bonus – 220 new homes will result in a New Homes Bonus payment of £2.6m.

Story Homes have provided further information about the values of the company within their vision brochure demonstrating their investment into apprentices and graduates as a key area of their business.

# BENEFITS AND INFRASTRUCTURE



The Site will provide a range of new and expanded infrastructure to ensure that the new development is sustainable and self-sufficient, has access to day-to-day services and facilities, and is capable of integrating successfully with the existing local community.



## Community Benefits

Through local engagement with the Culcheth Community Primary School Story Homes are proposing to:

- Provide a new pedestrian crossing on Warrington Road. This will improve pedestrian access and also slow traffic on Warrington Road.
- Improve the pickup and drop-off process surrounding the nearby educational facilities and the bus lay-bys to improve traffic flows at peak periods. We would welcome a meeting with the Council highways and education departments to establish how these improvements can be brought forward
- In addition to a network of green infrastructure throughout the Site, Story Homes are also proposing to provide a network of public footpaths across the Site that utilise the recreational value of the new green spaces.
- Explore with the Council how we can look to discourage anti-social behaviour in the unlit play area/skate park after dark.

Story Homes can confirm that the Site is:

- Available for development. Story Homes has an agreement with all of the landowners with an interest in the Site, to bring it forward for residential development (subject to its release from the Green Belt). There are no legal or ownership constraints to its delivery;
- Achievable and viable for residential development. It is located in a strong market area which experiences high demand for new homes and there are no overriding constraints which present an obstacle to its delivery.

# 09 CONCLUSION



The emerging Local Plan recognises that Warrington must provide new homes both to meet the needs of its population and to underpin economic growth. Warrington Borough Council acknowledges that this cannot be achieved on brownfield land alone. Green Belt releases are essential.

This Vision Document sets out how the land at Warrington Road, Culcheth can provide a new, high quality residential development. It will provide attractive and well-built family homes as part of a sustainable natural and tranquil environment, integrated with new green and blue infrastructure. It will help Warrington to meet its growing and urgent housing needs.

The Site can be brought forward using a comprehensive masterplanning process, with significant involvement from both Warrington Borough Council and the existing local community.

This vision document provides the evidence to demonstrate that Warrington Road in Culcheth represents a logical and sustainable development opportunity where the exceptional circumstances to support its release from the Green Belt are clear. A number of technical assessments have been undertaken which confirm that there are no physical constraints or other potential impacts or environmental conditions which could preclude the development of the Site for housing. The proposed development clearly accords with the three dimensions of sustainable development as set out in the NPPF.

# NEXT STEPS

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The Site is in the control of a well-known high quality housebuilder (Story Homes), and is considered suitable and deliverable within the first 5 years of the emerging Local Plan period.

Story Homes are committed to progressing the emerging Concept Masterplan towards a high quality residential development that responds to the local housing need, whilst taking into account and reflecting the character of the surrounding settlement, and ensuring the development of the Site would form a new defensible Green Belt boundary to the east of the village.

Story Homes looks forward to working with Warrington Borough Council to progress the proposals for the Site.

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**Warrington Proposed  
Submission Version Local  
Plan  
Representations on behalf of  
Story Homes**

**Land at Runcorn Road, Higher Walton**

June 2019

**LICHFIELDS**

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## 1.0 Introduction

### Purpose

1.1 Lichfields is instructed by Story Homes [Story] to make representations to the Warrington Proposed Submission Version Local Plan [Local Plan] published for consultation by Warrington Council in April 2019. These representations follow previous representations to the Local Plan Preferred Development Option which were submitted on behalf of Story by other parties in September 2017.

1.2 These representations are made in the context of Story's development interests in Warrington at:

- 1 Runcorn Road, Higher Walton (part of the proposed Warrington South West Sustainable Urban Extension);

1.3 The following documents accompany these representations:

- 1 Warrington South West Urban Extension Development Prospectus (June 2019)
- 2 Runcorn Road, Higher Walton Vision Document (September 2017)

1.4 Story fully supports the inclusion of the Runcorn Road site as part of the South West Urban Extension allocation under Policy MD3.

1.5 It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the National Planning Policy Framework [the Framework].

1.6 There is no statutory definition of "soundness". However, the Framework states that to be sound a Local Plan should be:

- 1 **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 2 **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3 **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
- 4 **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.7 In addition, the Framework<sup>1</sup> states that:

*"Plans and decisions should apply a presumption in favour of sustainable development."*

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<sup>1</sup> The Framework - §11

*For plan-making this means that:*

- a *Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b *Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - i *The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

1.8 This report demonstrates that a number of policies within the Local Plan require amendments in the context of the tests of soundness established by the Framework.

## **Structure**

1.9 Representations to the following Local plan policies are provided in this report:

- 1 Policy DEV1 – Housing Delivery
- 2 Policy DEV2 – Meeting Housing Needs
- 3 Policy GB1 – Green Belt
- 4 Policy INF1 – Sustainable Travel and Transport
- 5 Policy INF5 – Delivering Infrastructure
- 6 Policy ENV7 – Renewable and Low Carbon Energy Development
- 7 Policy MD3 – South West Urban Extension



## 2.0 **Policy DEV1 – Housing Delivery**

### **Introduction**

- 2.1 Policy DEV1 sets out the housing requirement for the 20-year plan period from 2017-2037 as a minimum of 18,900 new homes (945 dwellings per annum [dpa]).
- 2.2 The policy identifies the housing distribution which proposes the majority of new homes (13,726 dwellings) to be delivered within the existing urban areas of Warrington, and the removal and allocation of two Green Belt sites known as the Garden Suburb (6,490 dwellings) and the South West Urban Extension (1,631 dwellings). In addition, a minimum of 1,085 homes are to be delivered on allocated sites removed from the Green Belt, including 200 homes in Culcheth and 430 homes in Lymm.
- 2.3 The policy proposes a ‘stepped’ housing requirement as follows:
- a 2017-2021 (first 5 years) – 847 dpa
  - b 2022 to 2037 (following 15 years) – 978 dpa
- 2.4 The policy states that the Council will give consideration to a partial review of the plan should monitoring indicate that a 5-year deliverable and /or subsequent developable supply of housing can no longer be sustained.

### **Housing Requirement**

- 2.5 The Warrington Local Plan Core Strategy [WLPCS], adopted in July 2014, sets out the Council's vision, aims and strategy for the Borough, including the overarching planning policies that will guide growth during the period to 2027.
- 2.6 However, in February 2015 the High Court quashed parts of the Warrington Local Plan Core Strategy, specifically:
- 1 Policy W1 and Policy CS2, and specifically to *"delivering sufficient land for housing to accommodate an annual average of 500 dwellings (net of clearance) between 2006 and March 2027, and a minimum of 10,500 over the whole period"*; and,
  - 2 Paragraph 6.38 relating to the delivery of *"1,100 new homes as a sustainable urban extension to West Warrington."*
- 2.7 The Council has resolved to prepare a new Local Plan, rather than seek to alter the Core Strategy to resolve the issues raised by the High Court. As part of the formulation of the evidence base for the new Local Plan, the Council has reviewed its Local Housing Need [LHN] using the standard methodology and alternative, employment-led, approaches.
- 2.8 Story welcomes the Local Housing Need Assessment's [LHNA's] use of the 2014 Sub-National Population Projections [SNPP], the Sub-National Household Projections [SNHP] and the Mid-Year Population Estimates [MYE]. Furthermore, Story agrees with GL Hearn's revised methodology which does not seek to adjust the SNPP to take account of Unattributable Population Change [UPC]; provides an uplift to counter falling household formation rates amongst younger households; and in particular, seeks to align with economic growth needs. Story considers that the Council's approach in respect of the calculation of LHN is, in general, positively prepared and supports Warrington's proposals to cater for its own housing need within its authority area. However, Story has some general comments as set out below.
- 1 The Council's LHN is aligned with a level of job growth that is well below what has been achieved in recent years and which is inconsistent with the employment land target. This

could result in a number of negative externalities including unsustainable commuting patterns. The assumptions underpinning the GL Hearn analysis are significantly over-inflating the age cohorts likely to comprise the bulk of the labour force in the years ahead, thus boosting job growth without a commensurate increase in housing need. GL Hearn's modelling suggests that a growth of 7,530 residents aged 15-64 will somehow support an increase of 16,200 economically-active residents, and 19,100 jobs (954 p.a.). This appears unlikely.

- 2 The Council's evidence suggests that they are planning for a level of employment land growth based on past take up rates, which equates to 362 ha going forward. By way of comparison, over that same time period, this level of B-Class land sustained 1,641 additional jobs annually – a figure more than 70% higher than the 954 p.a. job growth the 945 dpa figure equates to (see Table 3 in WBC's Economic Development Needs Assessment report). This indicates that the level of employment land that the Council is planning for will generate a level of job growth considerably in excess of the level that could be serviced by the increase in labour supply resulting from 945 dpa.
- 3 Story has concerns with GL Hearn's approach to calculating the annual affordable housing requirement. However, even taking the Council's evidence at face value, the LHNA identifies a very high level of affordable housing need of 377 p.a.. This represents a significant increase on the 250 dpa figure in the 2017 SHMA, suggesting that the situation is deteriorating. GL Hearn concludes that the affordable housing need (377 dpa) delivered at a rate of 25% of all delivery would require a total delivery of 1,508 dpa, although they are quick to clarify that this is not likely to be deliverable or realistic. Nevertheless, the LHNA explores the scale of uplift that could be appropriate to address needs:

*“However, the Council could still consider an increase to the OAN as per the PPG to deliver more affordable homes. There is no set methodology for how to do this, but other areas have used a nominal 5% or 10% uplift to the OAN when developing their housing requirement.*

*Given the affordable housing requirement in Warrington we have given consideration for such an uplift in Warrington if the 5% is applied to the OAN of 909 then we would arrive at a housing requirement of 955 dpa.*

*Ultimately this uplift above the standard methodology is a choice for the Council but a requirement of around 950 dpa would seem reasonable to examine and also aligns with the economic-led need.” [paragraphs 8.29-8.31]*

The Council appears to have ignored this advice and has retained the 945 dpa figure in its emerging Local Plan with no uplift to help meet the very high need for affordable housing.

- 2.9 Story considers that the Council should be planning for a higher LHN figure in the Local Plan in order to ensure that the above matters are addressed.

## **Housing Distribution**

- 2.10 Story generally supports the overall distribution strategy identified in the policy including the proposed Green Belt release and allocation of the South West Urban Extension (SWUE) site and the distribution of a proportion of the housing requirement to the outlying settlements.

## **Housing Trajectory**

- 2.11 The Housing Trajectory and Stepped Housing Supply set out in Policy DEV 1 and at Appendix 1 of the Submission Local Plan sets out WBC's current position on its housing trajectory of

deliverable and developable sites. This assessment has been prepared following the revised Framework definition of ‘deliverability’ and the publication of the Housing Delivery Test [HDT] results.

- 2.12 The Housing Trajectory suggests a total of 20,643 homes could be delivered over the plan period, of which 4,132 units would be delivered over the course of the first 5 years of the plan. The annual average delivery over the first five years of the plan is 826 dwellings, which equates to 87% of the 945 dpa LHN, and even below the stepped requirement of 847 dpa for the first 5 years. Story acknowledges that WBC has applied a stepped trajectory to its housing requirement but is concerned that this serves only to push housing supply further back into the plan period. Indeed, given that Policy DEV1 (6) refers to 5 year monitoring and states that the Council will give consideration to a review or partial review Story is concerned that the Council should plan positively now and ensure that it identifies sufficient sites to support the Government’s objective of significantly boosting the supply of homes. This is discussed in more detail below.
- 2.13 The PPG<sup>2</sup> states that a stepped requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. It states that strategic policy-makers will need to set out evidence to support using stepped requirement figures, and not seek to unnecessarily delay meeting identified development needs. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.
- 2.14 In this instance, WBC has applied a stepped trajectory to accommodate for the increased delivery later in the plan period of the Waterfront, South West Urban Extension and Garden Suburb. At present, the Council cannot demonstrate a 5YHLS even with a stepped trajectory of 845 dpa for the first 5 years (equal to 4,225 homes), as Appendix 1 indicates that even if all the housing sites proceed precisely as planned, only 4,132 homes (826 dpa) are deliverable.
- 2.15 In addition, the results of the HDT indicate that WBC should apply a 20% buffer to the assessment of five-year housing land supply. This has not been included within the Submission Local Plan, which gives further weight to the argument that the authority cannot demonstrate a 5YHLS against the Local Housing Need.
- 2.16 The Submission Local Plan (Appendix 1) sets out a Housing Trajectory and Stepped Housing Supply over the course of the Plan period. This indicates that 4,132 units can be delivered over the course of the first 5 years of the plan from sites within the urban area and on Green Belt sites. Applying a 20% buffer as per the HDT would suggest that a requirement of 5,082 is needed – a shortfall of 950 units.
- 2.17 The PPG sets out how local authorities can demonstrate that they have a confirmed 5YHLS as part of the plan examination<sup>3</sup>:

*“The NPPF gives local planning authorities the opportunity to demonstrate a confirmed 5 year supply of specific deliverable housing sites. This needs to be done initially through the plan examination process, and may then be refreshed annually following adoption (provided the plan remains up to date), through the preparation of an Annual Position Statement. In both these circumstances, it will only be possible to establish a confirmed 5 year supply if an appropriate buffer has been applied and the authority’s assessment of its supply has been tested sufficiently through the examination or Annual Position Statement process.”*

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<sup>2</sup> Practice Guidance - ID: 3-034-20180913

<sup>3</sup> Practice Guidance – ID3-049-20180913

- 2.18 Story therefore considers that the Council is unable to demonstrate a defensible five-year housing land supply position at the current time and should explore every avenue available to increase the supply of housing in the short term. This should include flexibility within SWUE Policy MD3 to allow development to come forward on this allocation in advance of funding being secured and a programme of delivery for the Western Link being confirmed.

### **Tests of Soundness**

- 2.19 Story Homes is concerned that Policy DEV 1 is at risk of failing the tests of soundness for the following reasons:

- 1 **It is not positively prepared:** There is a risk that the objectively assessed needs will not be met.
- 2 **It is not Justified:** The evidence in the LHNA is not considered to be robust.
- 3 **It is not effective:** It will fail to deliver much-needed housing in the early years of the plan.
- 4 **It is not consistent with national policy:** The provision of a deliverable five year housing land supply in accordance with the Framework [S73] will not be achieved.

### **Recommended Change**

- 2.20 To address the conflict above and ensure the Policy is sound, it is requested that the Local Plan:
- 1 Reviews its housing requirement in light of the comments made above.
  - 2 Includes flexibility within SWUE Policy MD3 to allow development to come forward on this allocation in advance of funding the Western Link being secured and a programme of delivery being confirmed.

## 3.0 Policy DEV2 – Meeting Housing Needs

### Introduction

3.1 Policy DEV2 deals with meeting housing needs including affordable housing, housing type and tenure, optional standards, housing for older people, self and custom build, and other needs.

### Consideration of Policy

3.2 Part 7 of the policy deals with housing type and tenure and Table 3 of the Local Plan provides a suggested mix breakdown based on the Local Housing Needs Assessment [LHNA]. Story Homes notes that the suggested mix for Affordable Housing (rented) properties differs between the LHNA and Local Plan as shown in Table 3.1.

Table 3.1 Warrington LHNA and Local Plan suggested affordable housing (rented) mix

	1-bed	2-bed	3-bed	4+ bed
Affordable housing (rented) in LHNA	30-35%	30-35%	25-30%	5-10%
Affordable housing rented in Local Plan	20-25%	40-45%	20-30%	5-10%

Source: Warrington LHNA and Local Plan

3.3 The reason for this difference is not explicitly stated in the Local Plan. If it is not a drafting error Story considers the reason for this difference should be explained in the explanatory text to Policy.

3.4 Part 9 of the policy states the following:

*“In residential development of 10 dwellings or more, the Council will seek that 20% of homes should be provided to Building Regulation Standard M4(2) ‘Accessible and Adaptable dwellings’.”*

3.5 Story considers that a blanket requirement for 20% on sites of 10 dwellings is not justified. There is no clear explanation as to why a 20% requirement has been applied, as this is not specifically recommended in the LHNA.

3.6 Story recognises the value of providing accessible and adaptable dwellings for those sectors of society which require them. However, Story is also concerned that the process used to identify requirement in the LHNA does not fully address the requirements of the Practice Guidance. More specifically, no assessment of the accessibility and adaptability of existing stock appears to have been undertaken as required by the Practice Guidance<sup>4</sup>. It could be the case that a significant proportion of the existing stock is capable of helping to meet the identified need which would reduce the need for further provision.

3.7 With regard to the provision of dwellings meeting M4(2) standards the LHNA [page 89] suggests that there is a need to increase the supply of adaptable dwellings. It suggests that the Council could consider (as a start point) requiring all dwellings to meet M4(2) Standards. However, for the reasons set out above we do not consider that such a requirement has been justified in the LHNA. However, the LHNA also recognises that this level of provision would not be appropriate and states:

<sup>4</sup> Practice Guidance - ID: 56-007-20150327

*“It should, however, be noted that there will be cases where this may not be possible (e.g. due to viability or site specific circumstances) and so any policy should be applied flexibly”.*

3.8 The Local Housing Needs Assessment therefore recognises that there may be circumstances in which provision is inappropriate.

3.9 Story considers that the recommendations on requirement should be reassessed to take into account the accessibility and adaptability of existing housing stock. Transparent evidence should also be provided to fully explain how any requirement identified has been derived. Flexibility should be provided in the Policy to allow for instances where any requirement level set may not be possible due to site specific circumstances.

3.10 Part 11 of the Policy states:

*“In residential development of 10 dwellings or more, 20% provision must be made to accommodate the needs of older people. The nature of this provision will be determined on a site by site basis depending on demand in a particular area and the appropriate type of provision for the site and/or scheme”.*

3.11 The explanatory text to the policy [§4.1.57] states that

*“For elderly people this may range from sheltered accommodation, residential care homes, extra care or adaptable homes depending on the nature of the site and proposals, and demand in the local area. For residential care homes a minimum of 80-120 bedroom spaces would be needed to reach the necessary critical mass to run a 24/7 operation. For sheltered housing a smaller number of approximately 30 units (or fewer) is acceptable.”.*

3.12 The land take for such uses could therefore have a significant impact upon the development potential of sites for general market housing and upon development viability. The Framework [§34] is clear that such policies should not undermine the deliverability of the plan. Story notes that the impact of this requirement upon site viability does not appear to have been factored into the Council's Viability Assessment.

3.13 Story is also concerned that, as this requirement could possibly include adaptable homes, there may be an element of 'double counting' given that Part 9 of the policy also sets out a requirement for adaptable homes.

3.14 For the above reasons, Story considers that this requirement is not justified and that this need would be better met through the allocation of specific sites which specifically provide for the types of accommodation identified.

## Tests of Soundness

3.15 Story is concerned that Policy DEV2 would not meet the tests of soundness because:

- 1 **It is not justified:** The Local Plan evidence base does not support a policy which sets a 20% blanket requirement for accessible and adaptable dwellings and a 20% requirement for Housing for Older People, in residential development of 10 dwellings or more. There is also the risk of an element of 'double counting' given that both parts 10 and 11 of the Policy could require adaptable homes.
- 2 **It is not consistent with national policy:** The impact of accommodating the needs of older people upon site viability does not appear to have been factored into the Council's Viability Assessment, contrary to the Framework.

## **Recommended Changes**

3.16

In order to help ensure the policy is sound it is considered that:

- 1 The requirement for accessible and adaptable dwellings should be reassessed to take into account the accessibility and adaptability of existing housing stock. Transparent evidence should also be provided to fully explain how any requirement identified has been derived. Flexibility should be provided in the Policy to allow for instances where any requirement level set may not be possible due to site specific circumstances.
- 2 Part 11 of policy DEV2 should be deleted and land should be allocated that specifically provides for the types of accommodation identified.

## 4.0 **Policy GB1 – Green Belt**

### **Introduction**

- 4.1 Policy GB1 identifies the areas of land which are proposed for removal from the Green Belt in the Local Plan. The policy and draft Proposals Map exclude the South West Urban Extension (SWUE) from the Green Belt.

### **Consideration of Policy**

- 4.2 The Local Plan sets out the exceptional circumstances sought by the Framework [S137] to justify the release of Green Belt land. This includes a demonstration of the exceptional circumstances for the release of the SWUE, the purpose of which is to provide a new sustainable community supported by local infrastructure and services, facilitated by the Western Link. Story Homes agrees that an exceptional circumstances case has been demonstrated for the release of Green Belt land, including the SWUE site.
- 4.3 Story also supports the removal of land at the SWUE from the Green Belt as proposed in Policy GB1 and on the Proposals Map. The 2016 Green Belt Assessment was undertaken at two levels, for both 'general areas' and specific land parcels. In terms of the general area assessment, the whole of the SWUE, including Story's land at Runcorn Road, falls within Area 14, which has been assessed as making an overall contribution of 'moderate'. At land parcel level, the majority of Story's land at Runcorn Road falls within Parcel WR65 which also includes a significant proportion of the SWUE site to the east. This parcel is identified as having a 'moderate' contribution.
- 4.4 All of Story's land at Runcorn Road is assessed in the Council's July 2017 Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites as part of a much wider area (Site R18/125). It is assessed as making a 'moderate' contribution in this document.
- 4.5 Given this 'moderate' Green Belt contribution, the exceptional circumstances demonstrated for the release of the SWUE and the strong sustainability credentials of the site, Story's land at Runcorn Road is considered to be appropriate for removal from the Green Belt.
- 4.6 As noted in the response to Policy MD3, part of the land which Story is promoting falls within the area of Green Belt land adjacent to the south west corner of the allocation boundary of the SWUE as currently proposed. Story considers that Policy MD3 should facilitate Green Belt compliant uses in this area, (e.g. SUDs drainage, open space etc) to serve the wider development and maximise development potential of the allocation, whilst also providing a more permanent development edge to the allocation and retention of the Green Belt between Halton and Warrington.
- 4.7 Story notes that ongoing Duty to Co-operate discussions are taking place between Warrington Borough Council and Halton Borough Council with regard to the release of Green Belt in this area and the need to ensure appropriate separation between the proposed Green Belt releases adjacent to the boundary between the two boroughs. As this area of Green Belt would be retained for Green Belt compliant uses, it is considered that this approach will contribute to protecting any resultant strategic gap and maintain the separate identity of Moore Village to the west.



## 5.0 **Policy INF1 – Sustainable Travel and Transport**

### **Introduction**

- 5.1 Policy INF1 seeks to deliver the Council objectives of improving the safety and efficiency of the transport network, tackling congestion and improving air quality, promoting sustainable transport options, reducing the need to travel by private car and encouraging healthy lifestyles.

### **Consideration of Policy**

- 5.2 Part 1(j) of the policy states that the Council will expect development to consider how it can be futureproofed, through the provision of measures to support new and emerging technologies, such as Autonomous Vehicles.
- 5.3 Whilst Story recognises the potential benefits of futureproofing development, there can be no guarantee that some forms of new and emerging technology will ever reach the mass market. It is therefore difficult to foresee which forms of technology will need to be supported through development at the current time. In any event, it is likely that technology such as autonomous vehicles will be designed to adapt with existing development, and futureproofing may not therefore be required to accommodate it.

### **Tests of Soundness**

- 5.4 Story is concerned that Policy INF1 would not meet the tests of soundness because:
- 1 **It is not justified:** Story considers that it will not be possible to futureproof development as suggested as it is not possible to foresee what forms of new and emerging technology will ever reach the mass market

### **Recommended Change**

- 5.5 In order to ensure that Policy INF1 is sound, it is considered that Part (j) of the policy should be deleted.

## 6.0 **Policy INF5 – Delivering Infrastructure**

### **Introduction**

- 6.1 Policy INF5 requires development to provide or contribute towards the provision of the infrastructure needed to support it.

### **Consideration of Policy**

- 6.2 Part 6 of the policy states that:

*“The Council will only consider the viability of development proposals at the planning applications stage where:*

*a. required planning obligations are in addition to those considered as part of the Local Plan’s viability appraisal; or*

*b. where there are exceptional site specific viability issues not considered as part of the Local Plan’s viability appraisal.*

*In these cases, applicants should provide viability evidence through an ‘open book’ approach to allow for the proper review of evidence submitted and for reasons of transparency. The Council will then be able to balance the benefits of the proposals against any harm arising from not securing the full planning obligation requirements”.*

- 6.3 The supporting text to the policy [S7.5.7] states that on larger site allocations, including the proposed urban extensions, the infrastructure requirements for the first 5 years of the plan have been identified in detail.
- 6.4 Whilst the Council has considered the implications of infrastructure provision in its Viability Appraisal to a certain extent, Story considers that the Council's evidence needs to demonstrate, in a transparent way, how all of the Policy requirements within the draft plan have been factored into the Assessment on an item by item basis, including relevant infrastructure requirements, such as the contributions to the Western Link. We have dealt with this matter in further detail in the response to the Council’s Viability Assessment which forms part of our response to Policy MD3.
- 6.5 This will help to avoid the need for the submission of further viability evidence to be provided at the planning application stage.
- 6.6 With regard to this matter, Story also notes that there is a lack of transparency in the Infrastructure Delivery Plan [IDP] on the precise infrastructure costs associated with the SWUE. For example, there is no clarification on the contribution required towards the Western Link.
- 6.7 Story recognises the importance of delivering the Western Link as part of the overall delivery of the site but considers that the amount of contribution required needs to be quantified and tested through the Council’s Viability Assessment. Story also considers that the Council needs to provide evidence of the timing for the delivery and funding of the Western Link to reflect the latest position following the recent announcement that the government will provide £142.5m towards the project. The Outline Business Case [OBC] for the Western Link identifies a local contribution of £70.2M which the funding case notes will be obtained by prudential borrowing. The Council has indicated that they will seek to recover as much as possible of this via developer contributions. Evidence also needs to be provided by the Council to clarify how any contributions sought for the Western Link will be split between the allocations identified in the

Local Plan, given that there will be considerable beneficiaries throughout the Borough and that the SWUE site is not the only site which will generate traffic that uses this link road.

## Tests of Soundness

6.8 Story is concerned that Policy INF5 would not meet the tests of soundness because:

- 1 **It is not justified:** The information provided by the Council does not demonstrate in a transparent way how all of the policy requirements within the Local Plan have been factored into the Viability Assessment. The policy is not currently transparent as it does not confirm the amount of contribution which will be sought from the SWUE for the Western Link and provides no clear and robust evidence of the timing for the delivery and funding. No evidence is provided by the Council to clarify how any contributions sought for the Western Link will be split between the allocations identified in the Local Plan.
- 2 **It is not consistent with national policy:** The contributions need to be clarified to demonstrate that the development of the SWUE site is viable in accordance with the Framework<sup>5</sup>.

## Recommended Change

6.9 The Viability Assessment work undertaken by the Council needs to be reviewed to ensure that the detail of all of the required infrastructure contributions is dealt with on an item by item basis to provide sufficient detail of all of the likely infrastructure contributions required. This information also needs to be included in the IDP. Recent announcements from the Government on Housing Infrastructure Fund [HIF] funding in Warrington (for the Centre Park link) should also be reflected in these documents.

6.10 In order to ensure that it is transparent and complies with the Framework, Story considers that the amount of contribution sought towards the Western Link from the SWUE site should be clarified. The Council should also provide separate technical evidence in advance of the Examination which sets out details of the proposed timing for the delivery of the Western Link and its funding and how any contributions sought for the Western Link will be split between the allocations identified in the Local Plan. This needs to be incorporated into the Council' Viability Assessment work and Infrastructure Delivery Plan accordingly.

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<sup>5</sup> The Framework - §57

## 7.0 **Policy ENV7 – Renewable and Low Carbon Energy Development**

### **Introduction**

- 7.1 Policy ENV7 sets out the approach and guidance on how development should respond to energy issues across the Borough.

### **Consideration of Policy**

- 7.2 Part 6 of Policy ENV7 requires the following:

*In the strategic housing and employment allocations as defined in Policies MD1 to MD4 and OS1 to OS9 and identified on the Key Diagram/Polices Map the Council will seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems that would use or generate renewable or other forms of low carbon energy. In these locations all development will be required to establish, or connect to an existing, decentralised energy network unless this is shown not to be feasible or viable, in which case development will be required to;*

*a. make provision to enable future connectivity in terms of site layout, heating design and site-wide infrastructure design; and*

*b. to ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy source(s).*

- 7.3 Story is concerned that the cost of providing such infrastructure has not been factored into the Viability Assessment and the implications of its provision cannot therefore be properly assessed.

### **Tests of Soundness**

- 7.4 Story Homes is concerned that Part 41 of Policy MD3 would fail the tests of soundness because:

- 1 **It is not justified:** From the Local Plan Viability Assessment, it is not clear whether the costs of providing such infrastructure have been factored into the viability appraisals undertaken.

### **Recommended Change**

- 7.5 The Council's evidence needs to demonstrate, in a transparent way, how the requirement for establishment or connection to decentralised energy systems in Policy ENV7 has been factored into the Viability Assessment.

## 8.0 **Policy MD3 – South West Urban Extension**

### **Introduction**

- 8.1 Policy MD3 removes 113ha of land to the south west of Warrington from the Green Belt and allocates the site as a sustainable urban extension. The allocation seeks to deliver around 1,600 homes supported by a range of infrastructure.
- 8.2 Story fully supports the proposed allocation of the South West Urban Extension site. Story's land at Higher Walton comprises four parcels with a combined area of approximately 21.28ha. These parcels are.
- Land south of Runcorn Road (east): approx. 7.34 ha
  - Land south of Runcorn Road (west): approx. 1.39 ha
  - Land east of Bellhouse Lane: approx. 10.75 ha
  - Land north of former railway line: approx. 1.75 ha
- 8.3 A plan showing these areas of land is attached at Appendix 1.
- 8.4 The land being promoted by Story is owned by one landowner under one single title and Story has an agreement with the landowner to promote the site. The delivery of the site is not therefore subject to any legal or ownership constraints. The site is available for the delivery of housing now, it offers a suitable location for housing and can be delivered in the first 5 years.
- 8.5 Story is working collaboratively with the other developers promoting the SWUE allocation, these being Peel Investments (North) and Ashall Property ('the Consortium members'). The Consortium is committed to continuing to work together, and with Warrington BC to, secure the delivery of much needed housing and associated infrastructure at the earliest opportunity.
- 8.6 A significant amount of technical assessment work has been undertaken on behalf of the SWUE Consortium members, both collectively and individually. As part of this process, Story has undertaken an evaluation of the technical and environmental constraints that could prevent or restrict the development of its land. This technical assessment work demonstrates that, subject to obtaining planning permission, there are no insurmountable obstacles to immediate development on Story's land or the SWUE site as a whole. The site is therefore fully developable in accordance with the Framework [Annex 2].
- 8.7 National policy seeks to ensure new developments are located in areas which limit the need to travel and offer a genuine choice of transport modes. The site would promote a sustainable pattern of development due to its relationship with the existing services and facilities in the area. The site lies within an area which benefits from being in close proximity to a range of local schools, services and facilities, together with employment opportunities. Moore and Higher Walton are both located within a 10 minute walk of the site and provide a number of facilities including, Moore County primary School, Moore Village Pre-School, Moor Village Store and Post Office, The Red Lion Public House, St John the Evangelist Church and The Walton Arms Public House. Local employment opportunities are available at Daresbury Park to the south of the site.
- 8.8 There are bus stops providing access to frequent bus services along Runcorn Road which run to destinations including Warrington and Runcorn town centres.
- 8.9 Notwithstanding the existing local services, development will also contribute to supporting infrastructure on the site including a primary school, local centre facilities with the ability to provide a range of units within Use Classes A1, A2, A5 and D1.

- 8.10 The development of the site for housing will bring a number of benefits in line with the principles of sustainable development. The future development of the site will have positive economic, social and environmental benefits and therefore constitutes sustainable development in accordance with the NPPF [para. 8].
- 8.11 From an economic perspective, the development of the site will contribute towards building a strong, responsive and competitive economy within Warrington. The delivery of high-quality housing on the site will contribute to ensuring that population growth within Warrington is focused in an area close to employment opportunities, which can be easily accessed via a sustainable transport network. The site will allow new working age families to settle in Higher Walton which will help to ensure a resident labour force in the area that is capable of supporting sustainable economic growth will not result in large increases in in-commuting from elsewhere in the region. The development of the site will bring a number of benefits including: additional Council Tax revenues and direct and indirect/induced job creation. Benefits from the construction of the site include the creation of jobs for the local economy where possible and the use of local construction firms and suppliers. Additional residents will also generate more spending power in the local area to enhance the vitality of local services.
- 8.12 From a social perspective, the development of the Site will support the creation of a strong, vibrant and healthy community by increasing the supply of housing in a sustainable location. The proposed development will comprise a high-quality built environment and will be designed to meet the needs of the area and complement the character of the surroundings. New homes will meet local needs and attract and welcome new families to the area and affordable housing to meet the identified needs of local residents. Public open space and recreation space, including play areas for children, would be available for use by both existing and future residents.
- 8.13 From an environmental perspective, the development provides the opportunity to deliver a number of benefits including: access to public transport facilities and existing shops, services and facilities within walking distance of the site; pedestrian and cycle routes; new green infrastructure including green corridors and open space; and, a design which is informed by the existing landscape and incorporates and protects existing features.
- 8.14 No environmental constraints have been identified that would inhibit the future allocation and development of the site.

## **Proposals Map**

- 8.15 Story notes that part of the land which it is seeking to promote for allocation has been excluded from the allocation boundary. This excluded land sits adjacent to the south west corner of the allocation boundary as currently proposed. The plan attached at Appendix 2 shows this area of land edged blue.
- 8.16 It is understood that the Council considers this area to be a sensitive Green Belt edge and Story agree. On this basis, Story Homes do not propose built development on this area but the Illustrative Concept Plan and Policy MD3 should facilitate Green Belt compliant uses such as drainage ponds, public open space and amenity open space to serve the wider development. This would allow the development potential of the allocation to be maximised by freeing up other land for housing rather than open space whilst also protecting the integrity of the Green Belt in this location.
- 8.17 This would provide greater certainty to Halton Borough Council regarding the permanence of the proposed strategic gap between the two settlements. The Framework [S145] also encourages the provision of appropriate facilities within the Green Belt including for outdoor recreation, as

long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

### **Consideration of Policy**

- 8.18 Whilst the proposed allocation is fully supported, Story is concerned that the allocation boundary identified and the proposed wording of Policy MD3 may not satisfy the soundness tests set out in the Framework. These concerns are outlined in more detail below.

#### **MD3.1 Key Land Use and Infrastructure Requirements**

- 8.19 Part 1 of the Policy identifies a site area of approximately 112ha. Officers have indicated in recent discussions that this is a typing error, and that the site measures 121 ha.
- 8.20 A concept masterplan for the SWUE has been prepared on behalf of the Consortium, and is presented in the enclosed Development Prospectus. The concept masterplan reflects land ownership boundaries and confirms that the site area of the SWUE is 119.6 ha.
- 8.21 The policy should therefore be amended to include the correct site area. The allocation boundary shown on the Proposals Map and Figure 10.3 should be reviewed against the latest Masterplan to ensure that the boundaries align.
- 8.22 Part 2 of the policy states that:
- “The allocation will deliver a new residential community of around 1,600 new homes...”*
- 8.23 The Framework<sup>6</sup> is clear that development plan policies should support development that makes efficient use of land. Story considers that the site is capable of accommodating around 1,800 dwellings and, in order to ensure that the aims of the Framework are achieved, and the development potential of the site can be maximised, the policy should be amended to make clear that around 1,800 dwellings will be delivered. The latest masterplan prepared by the developers promoting the site indicates that approximately 1,800 dwellings could be provided and Story considers that the explanatory text to the policy should refer to this masterplanning work and this potential capacity for around 1,800 units.
- 8.24 Parts 2a to 2l of the policy list the land use and infrastructure requirements for the site. These requirements are dealt with in detail under subheadings MD3.2 and MD3.3 of the policy. Our response to these detailed requirements is set out below.

#### **Tests of Soundness**

- 8.25 Story is concerned that Part 2 of the policy would not meet the tests of soundness because:
- 1 **It is not positively prepared:** the policy may unnecessarily restrict the delivery of development on the site and lead to the inefficient use of land contrary to the Framework by placing a development limit on the site which is too low.

#### **Recommended Change**

- 8.26 The policy wording should be amended to refer to around 1,800 dwellings. The policy or the explanatory text to the policy should also refer to the contextual masterplan which shows a capacity for around 1,800 dwellings to confirm that there is no reason to prevent a higher number of dwellings coming forward at the detailed design stage.

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<sup>6</sup> The Framework - §122

### **MD3.2 Delivery and Phasing**

8.27 Part 7 of the policy states that:

*“No development will be permitted until funding has been secured and a programme of delivery has been confirmed for the Western Link”.*

8.28 Technical highways work undertaken for the site indicates that a first phase of development could be delivered in advance of the Western Link and will not result in severe impacts.

8.29 The earlier delivery of dwellings on the site would assist the Council in meeting its housing requirement in the first five years of the plan and help to avoid the need for a ‘stepped’ approach as currently proposed. The Council has an acute housing need and has not delivered its requirement in recent years, as evidenced in the Housing Delivery Test which identified 55% delivery resulting in the need for a 20% buffer. It is therefore imperative that the SWUE site comes forward for development as soon as possible. In doing so, the Council could also benefit from a reduction to interest accrued from their funding mechanisms as S106 contributions for the Western Link from the allocation, (if required) will also come forward sooner than envisaged, reducing the financial burden to the Council and overall cost of the Link Road in general.

### **Tests of Soundness**

8.30 Story is concerned that Part 7 of Policy MD3 would not meet the tests of soundness because:

- 1 **It is not positively prepared:** This approach is considered to be contrary to the objectives of the Local Plan as it would prevent developers proceeding with a deliverable application. The policy wording would unnecessarily stall the delivery of residential development which is capable of coming forward in the early years of the plan and contributing to the Council’s five year supply.
- 2 **It is not justified:** The site is capable of delivering residential development prior to the delivery of the Western Link. There does not appear to be any evidence in the evidence base to confirm that this is not the case. In order to ensure that the policy is sound, evidence should be provided to consider the delivery of an initial development phase prior to the delivery of the Western Link. The Infrastructure Delivery Plan [IDP] is not transparent on the funding of the Western Link and how contributions will be split between the Local Plan allocations in the vicinity. It also does not appear to clarify whether any other sites will need to contribute given that wider Warrington will benefit from the Western Link when it is in place. Evidence which provides confirmation of the funding mechanism and funding timescales for delivering the Western Link should also be provided.

### **Recommended Change**

8.31 Story considers that the policy should allow for some small-scale development to come forward prior to the delivery of the Western Link Road, provided that a transport assessment demonstrates such a proposal does not have an unacceptable impact on highway safety, or the residual cumulative impacts on the road network are not severe, as set out in the Framework [S109]. Appropriate wording should be added to the policy to allow developers to proceed with a deliverable application and to allow developers to mobilise the site. This wording could include a mechanism to prohibit the occupation of dwellings to ensure that isolated development in the open countryside would not be occupied in advance of the link road funding being secured.



## MD3.3 Detailed Site-Specific Requirements

### Part 12

- 8.32 Part 12 requires a residential care home (Use Class C2) providing a minimum of 80 bedrooms and located close to the local centre. Whilst the Council's evidence base identifies a general need to provide additional accommodation for residents aged over 65 across the Borough, it does not demonstrate that such provision is required in South West Warrington. An overall need for C2 accommodation is identified in the Local Housing Needs Assessment (1,597 C2 bed spaces 2017-37) but there is no clear justification for the provision of a minimum of 80 bedspaces on the site or the landscape that the C2 proposals would take. No provision appears to have been made in the Viability Appraisal for C2 development on the site.

### Tests of Soundness

- 8.33 Story is concerned that Part 12 of Policy MD3 would not meet the tests of soundness because:
- 1 **It is not justified:** There is no clear justification for the provision of C2 accommodation on the site. No provision appears to have been made in the Viability Appraisal for C2 development on the site and this information is needed to ensure that the policy is sound.

### Recommended Change

- 8.34 The potential provision of a residential care home (Use Class C2) on the site should be referred to as part of the range of uses which could be delivered on the site, rather than as infrastructure which is required to be delivered.

### Part 13

- 8.35 Part 13 of the policy requires specific provision to be made for self-build/custom build plots subject to local demand as demonstrated by the Council's self-build register. Story objects to this requirement for the reasons set out below.
- 8.36 Whilst it is accepted that new development should contribute to achieving an appropriate mix of housing, no evidence has been provided by the Council to demonstrate how the cost of providing self-build plots has been taken into consideration. The Framework<sup>7</sup> states that all viability assessments including any undertaken at the plan making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available. We can find no evidence in the Viability Assessment that this cost has been taken into consideration. In the absence of this viability evidence, the Local Plan fails to demonstrate the impact this requirement would have upon the deliverability and developability of sites for market housing.
- 8.37 The Council has a legal obligation to grant sufficient planning permissions to meet the demand for self-build and custom housebuilding. It is considered that the Policy approach would not be effective, as it would provide no guarantee that the Council's obligation to ensure that sufficient self and custom build plots are provided to meet demand, would be achieved. As it is not known what level of provision for such plots could be achieved on schemes by market housing developers, across the borough, the Council cannot rely on these sites as the source of supply to meet this demand. The Council should therefore identify an alternative mechanism to ensure that this demand can be met. Story Homes considers that the only way this can be achieved is through the Council identifying standalone sites which are specifically allocated to meet this demand. With regard to this matter, Story Homes also notes that another North West authority,

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<sup>7</sup> The Framework §57

West Lancashire Council<sup>8</sup>, is not intending to implement a requirement for allocated sites to set aside land for self-builders, based on feedback from consultation which indicated that it would not be advisable.

8.38 We are aware that the requirement of custom build/self-build plots has been the subject of significant debate at two recent Local Plan Examinations (Oadby and Wigston and Harborough) because whilst there may be demand for them, the reality of having the means and finance to deliver them is not clear. The provision of self-build properties should not be to the detriment of delivering a comprehensive and well-designed scheme.

8.39 Story also notes that the Council's commitment to delivering of self build plots is set out in policy DEV2 so there would still be a mechanism for the Council to secure plots within the local authority area if this requirement is removed from Policy MD3.

### **Tests of Soundness**

8.40 Story is concerned that Part 13 of Policy MD3 would not meet the tests of soundness because:

- 1 **It is not justified:** It is not clear from the Local Plan Viability Assessment how the cost of providing self-build plots has been taken into consideration. For the Policy to be sound this evidence needs to be provided. The evidence requiring the scale of C2 bedrooms on the SWUE Site need to be provided by the Council.
- 2 **It is not effective:** The Council has a legal obligation to grant sufficient planning permissions to meet the demand for self-build and custom housebuilding. It is considered that the Policy approach would not be effective, as it would provide no guarantee that the Council's obligation to ensure that sufficient self and custom build plots are provided to meet demand, would be achieved.

### **Recommended Change**

8.41 Story considers that the requirement for the provision of self-build plots should be deleted from the policy.

### **Part 14**

8.42 Part 14 states that to reflect the site's urban fringe location adjacent to the open countryside the development will be constructed to an average minimum density of 30dph. Story considers the policy wording to be unduly restrictive and considers that flexibility should be provided in the policy to deliver increased minimum densities in appropriate areas of the site (e.g. within/adjacent to the local centre and existing urban area).

### **Tests of Soundness**

8.43 Story is concerned that Part 14 of Policy MD3 would not meet the tests of soundness because:

- 1 **It is not consistent with national policy:** The policy could result in the inefficient use of land by unnecessarily applying lower density requirements where higher density development would be appropriate. This approach would fail to align with the objectives of the Framework [S122] which seeks to promote the efficient use of land with development at high densities where appropriate.

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<sup>8</sup> West Lancashire local Plan Review Preferred Options (August 2018) §5.19

### **Recommended Change**

- 8.44 The policy should be re-worded so that provision is made to deliver increased minimum densities in appropriate areas of the site (e.g. within/adjacent to the local centre and existing urban area).

### **Part 16**

- 8.45 Part 16 requires development to make a contribution towards the provision of additional secondary school places through the expansion of existing or planned new secondary schools. However, no robust evidence of existing capacity in the local area appears to have been provided to justify this contribution.

### **Tests of Soundness**

- 8.46 Story is concerned that Part 16 of PolicyMD3 would not meet the tests of soundness because:
- 1 **It is not justified:** No robust evidence of a shortfall in existing secondary school capacity in the local area appears to have been provided to justify this contribution.

### **Recommended Change**

- 8.47 The policy should be re-worded to make clear that development will be expected to make a financial contribution towards the provision of additional secondary school places where evidence of existing capacity in the local area justifies such a contribution and that such contributions would meet the CIL Regulations and be proportionate to the additional demand generated through the development of the site.

### **Part 18**

- 8.48 Part 18 requires that the new local centre should provide a focal point for the new community and should be located in a central and accessible position within the site.

### **Tests of Soundness**

- 8.49 Story is concerned that Part 18 of Policy MD3 would not meet the tests of soundness because:
- 1 **It is not effective:** The policy does not provide sufficient flexibility to facilitate commercial decisions on the location and delivery of the local centre.

### **Recommended Change**

- 8.50 Part 18 should provide additional flexibility over the location of the new local centre to enable the final position to be determined through the detailed masterplanning stage and following commercial discussions with potential retailers / occupiers.

### **Part 22(a)**

- 8.51 Part 22(a) requires delivery of a minimum of 10.30ha of open space, comprising 2.02ha of informal play space; 7.36ha of natural/semi-natural green space and 0.47ha of allotments, and 0.92ha of equipped play. Story notes that the overall requirement of 10.3ha is more than the sum of the component parts (9.85ha).

### **Tests of Soundness**

- 8.52 Story is concerned that Part 22(a) of Policy MD3 would not meet the tests of soundness because:

- 1 **It is not justified:** No robust evidence of existing open space provision and need appears to have been provided to justify this contribution.

### **Recommended Change**

- 8.53 To ensure that the policy is transparent, the extent of the open space sought should be justified by robust evidence having regard to the open space standards and the quantity, quality and accessibility of existing provision. The reason as to why the overall open space requirement is greater than the sum of its parts should also be clarified.

### **Part 22(c)**

- 8.54 Part 22(c) requires provision of playing pitches (either on-site or a contribution towards off-site provision). Story considers that robust evidence needs be provided to demonstrate an existing shortfall in the local area and that such contributions would meet the CIL Regulations and be proportionate to the additional demand generated through the development of the site.

### **Tests of Soundness**

Story Homes is concerned that Part 22(c) of Policy MD3 would not meet the tests of soundness because:

- 1 **It is not justified:** No robust evidence of existing playing pitch provision in the local area appears to have been provided to justify this contribution.

### **Recommended Change**

- 8.55 The policy should confirm that the extent of playing pitch contribution sought will need to be justified by robust evidence which takes account of evidence of current local provision and that such a contribution would need to meet the CIL Regulations.

### **Part 26**

- 8.56 Part 26 requires a contribution to expand and enhance existing or planned built leisure facilities (principally sports centre/swimming pool provision). In order to ensure that such a requirement is CIL compliant, in particular that it is necessary to make the development acceptable in planning terms, the need for these facilities needs to be demonstrated through the appropriate evidence including an assessment of existing provision. However, no evidence of this need is provided in the Policy and the accompanying explanatory text provides no reference to any relevant evidence base documents to support this requirement. Whilst identified as a contribution in the Infrastructure Delivery Schedule in the IDP, no evidence is provided in the IDP to support this requirement and how it specifically relates to the SWUE.

### **Tests of Soundness**

- 8.57 Story Homes is concerned that Part 26 of Policy MD3 would not meet the tests of soundness because:

- 1 **It is not justified:** No robust evidence of existing leisure facility need and provision appears to have been provided to justify this contribution, including in the IDP.

### **Recommended Change**

- 8.58 The policy should confirm that any requirement for a contribution to built leisure facilities will be justified by the appropriate evidence of need which takes account of evidence of current local provision and that such a contribution would need to meet the CIL Regulations.

### Part 30

- 8.59 Part 30 states that western boundary of the site, comprising the Bridgewater Canal, Holly Hedge Lane and Bellhouse Lane defines the Green Belt boundary. Part of the land which Story is promoting falls within this area. This excluded land sits adjacent to the south west corner of the allocation boundary as currently proposed. Story considers that Policy MD3 should facilitate Green Belt compliant uses in this area, such as public open space and amenity open space to serve the wider development and maximise development potential of the allocation. This approach will protect the strategic gap and maintain the separate identity of Moore Village to the west. This could reasonably be promoted at detailed application stage, but Story considers that the inclusion of appropriate wording in the Local Plan at this stage would confirm appropriateness of this land for Green Belt compliant uses.

#### Tests of Soundness

- 8.60 Story Homes is concerned that Part 30 of Policy MD3 would not meet the tests of soundness because:
- 1 **It is not consistent with national policy:** The policy could result in the inefficient use of land by failing to provide land for open space which would free up land within the allocation for residential development. This approach would fail to align with the objectives of the Framework [S122] which seeks to promote the efficient use of land.

#### Recommended Change

- 8.61 Part 30 of Policy MD3 should facilitate Green Belt compliant uses in this area, such as public open space and amenity open space to serve the wider development and maximise development potential of the allocation.

### Part 34

- 8.62 Part 34 states that the development will be expected to make a proportionate contribution towards the delivery of the Western Link Road. Story recognises the importance of delivering the Western Link as part of the overall delivery of the site but considers that the amount of contribution required needs to be quantified and tested through the Council's Viability Assessment. Story also considers that the Council needs to provide evidence of the timing for the delivery and funding of the Western Link to reflect the latest position following the recent announcement that the government will provide £142.5m towards the project. Evidence also needs to be provided by the Council to clarify how any contributions sought for the Western Link will be split between the allocations identified in the Local Plan, given that the SWUE site is not the only site which will generate traffic that uses this link road.

#### Tests of Soundness

- 8.63 Story Homes is concerned that Part 34 of Policy MD3 would not meet the tests of soundness because:
- 1 **It is not justified:** The policy is not currently transparent as it does not confirm the amount of contribution which will be sought from the SWUE and provides no clear and robust evidence of the timing for the delivery and funding. No evidence is provided by the Council to clarify how any contributions sought for the Western Link will be split between the allocations identified in the Local Plan.

- 2 **It is not consistent with national policy:** The contribution needs to be clarified to demonstrate that the development of the SWUE site is viable in accordance with the Framework<sup>9</sup>.

### **Recommended Change**

- 8.64 In order to ensure that it is transparent and complies with the Framework, Story considers that the amount of contribution sought towards the Western Link from the SWUE site should be clarified in the policy. The Council should also provide separate technical evidence in advance of the Examination which sets out details of the proposed timing for the delivery of the Western Link and its funding and how any contributions sought for the Western Link will be split between the allocations identified in the Local Plan. This need to be incorporated into the Council' Viability Assessment and Infrastructure Delivery Plan accordingly.

### **Part 41**

- 8.65 Part 41 requires the development to mitigate the impacts of climate change; be as energy efficient as possible and seek to meet a proportion of its energy needs from renewable or low carbon sources in accordance with policy ENV7. Part 6 of Policy ENV 7 states the following:

*“In the strategic housing and employment allocations as defined in Policies MD1 to MD4 and OS1 to OS9 and identified on the Key Diagram/Polices Map the Council will seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems that would use or generate renewable or other forms of low carbon energy. In these locations all development will be required to establish, or connect to an existing, decentralised energy network unless this is shown not to be feasible or viable, in which case development will be required to;*

*a. make provision to enable future connectivity in terms of site layout, heating design and site-wide infrastructure design; and*

*b. to ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy source(s)”.*

### **Tests of Soundness**

- 8.66 Story Homes is concerned that Part 41 of Policy MD3 would not meet the tests of soundness because:

- 1 **It is not justified:** From the Local Plan Viability Assessment, it is not clear whether the costs of providing such infrastructure have been factored into the viability appraisals undertaken.

### **Recommended Change**

- 8.67 The Council's evidence needs to demonstrate, in a transparent way, how the requirement for establishment or connection to decentralised energy systems in Policy ENV7 has been factored into the Assessment.

### **Parts 45 to 48**

- 8.68 Parts 45 to 48 of the Policy set out detailed requirement for the site in relation to the historic environment.

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<sup>9</sup> The Framework - §57

- 8.69 The current wording of Part 45 of draft Policy MD3 imposes a 'mandatory requirement' to preserve and enhance heritage assets, irrespective of any balancing exercise taking account of public benefits which duly affords 'considerable' weight to preserving or enhancing designated heritage assets (in accordance with Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990). In addition, the draft policy seeks to impose a higher test for assessing non-designated heritage assets than is justified.
- 8.70 Part 48 states that the surroundings and setting of the Walton Village Conservation Area should be enhanced through ensuring that the design of development on the Chester Road frontage is sympathetic to the Conservation Area, of high quality and limited in height to two storeys. The Consortium is concerned that the current wording of Part 48 of Policy MD3 is not consistent with national policy and the statutory duties.

### **Test of Soundness**

- 8.71 Story Homes is concerned that Parts 45 and 48 of Policy MD3 would not meet the tests of soundness because:

- 1 **It is not consistent with national policy:** The policy is not in accordance with national planning guidance and Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990).

### **Suggested Change**

- 8.72 Parts 45 and 48 should be appropriately re-worded to align with national policy and the statutory duties.
- 8.73 Suggested alternative wording for Policy MD3, which reflects the above comments, has been provided in the representation prepared on behalf of the Consortium by Turley.

## **Figure 10.3 – Illustrative Concept Plan for South West Extension**

- 8.74 As noted in our comments on Part 30 of the Policy, Story considers that its land to the south west of the SWUE allocation boundary should be identified on the Concept Plan as having the potential to provide Green Belt compliant uses such as open space to increase site efficiency within the allocation boundaries.

## **Local Plan Appendix 1 – Housing Trajectory**

- 8.75 The Housing Trajectory which forms Appendix 1 to the Local Plan indicates that first dwellings will be delivered on the SWUE site in 2023/2024 at an annual build rate of 116/117 dwellings per annum from 2023/2024 onwards. Based on the proposed start date the Councils trajectory indicates that a total of 1,631 dwellings will be delivered by the end of the plan period in 2036/37.
- 8.76 Story have reviewed the draft trajectory provided by the Council and have the following comments:
- 1 In terms of start date, the Council has assumed that a delivery strategy for the Western Link must be confirmed before any delivery comes forward. At this point it is assumed the Western Link will be delivered over the timeframe currently anticipated by the Council i.e. to enable the first homes in the urban extension to be completed in 2023/24 as indicated in the Local Plan [S10.3.19]. However, as noted above, technical highways work undertaken

by the developers promoting the site indicates that a first phase of development could be delivered in advance of the Western Link and will not result in severe impacts. Any mitigating highway works required can be undertaken within the adopted highway without the requirement for third party land. The number of units which could be delivered prior to the Western Link would need to be assessed as part of any future planning application for development on the site.

- 2 The expectation is that the Local Plan will be adopted in 2020/21. This is the year in which the development of the site would be fully policy compliant. There are no ownership constraints to the development of any part of the site, and all the developers involved are committed to working in partnership to progress a masterplan for the comprehensive development of the site.
- 3 Based on the above, it is expected that the masterplan will be fully endorsed and the first full planning applications for development submitted in 2020/21. Allowing time for determination of those applications, the discharge of conditions and mobilisation of contractors it is expected that the first dwellings on the site will be delivered in 2021/22.
- 4 The Council's trajectory expects that minimum delivery rates will be achieved from the first year of delivery. This is likely to be optimistic as contractors will need to be mobilised and initial site infrastructure (access points, internal road, drainage etc.) put in place. Instead it is recommended that a three month mobilisation period post planning is allowed for.
- 5 The Council's trajectory is based on an assumption that the site will be delivered by two housebuilders/outlets. This represents a cautious approach as the site is expected to be built out by four housebuilders, each delivering 30 dwellings per annum (dpa) within their respective phase plus 10 affordable units (i.e. a total of 40 dpa per housebuilder). This indicates that once maximum delivery rates are achieved, the site will be capable of delivering 160 dpa. At this stage, it is envisaged that there are likely to be three outlets on the site from the outset, increasing to four sales outlets from 2026/27.
- 6 The Council's trajectory assumes that the SWUE allocation can deliver around 1,600 dwellings, which reflects the current wording of Policy MD3. However, the masterplanning undertaken by the Consortium to date indicates that the SWUE could accommodate around 1,800 dwellings.

8.77 Story therefore considers that the trajectory for the SWUE should be amended to reflect the above comments.

## **Warrington Local Plan Viability Assessment**

8.78 A detailed response to the Local Plan Viability Assessment has been prepared by Turley on behalf of the Consortium members promoting the SWUE (Story, Peel Investments (North) and Ashall Property). A copy of this response is attached as Appendix 3 to this representation for information.

8.79 All of the Consortium wholly support the allocation of the SWUE and wish to ensure that the Council's evidence is robust and justified in the context of the soundness tests in the Framework. The consortium consider that the scheme is viable but not to the same extent as the Council. The Turley response outlines the matters the Consortium consider that the Council needs to address in its evidence in order for Policy MD3 and the supporting evidence base to be found sound. Specifically, it appears that critical costs are omitted or understated and revenues are overly optimistic, which poses a risk that draft policy within the Local Plan will be overly onerous. In summary, the detailed representations demonstrate that:

- 1 The delivery of the SWUE allocation is viable and deliverable.



- 2 Certain fundamental appraisal assumptions adopted within the Council's LPVA are incorrect, un-evidenced, or inadequately evidenced. The impact of this is that the results of the LPVA overstate the financial viability of the development.
- 3 Elements of PSLP Policy MD3 have not been effectively assessed in accordance with the Framework and the Government's Planning Practice Guidance on Viability (PPGV). Elements of the policy are, therefore, unsound as they are not justified.
- 4 Whilst the Consortium holds concerns in respect of the approach to large scale scheme modelling adopted in the LPVA, Turley has re-appraised the 'SW Extension parcel 1' with appraisal assumptions amended in line with the commentary and amendments proposed within the representation.
- 5 Following correction of errors, and amendments to a number of assumptions, the revised appraisal indicates that SWUE parcel 1 is viable following the application of affordable housing and other housing policies, in line with the PSLP. Following the methodology adopted in the LPVA, it can be determined that the remaining parcels of the SWUE site would produce almost identical results.
- 6 In line with the Turley appraisal, the SWUE site is determined to be viable and capable of fulfilling the Council's housing policies (to the extent that was tested in the LPVA).
- 7 The LPVA takes no account of contributions that are anticipated to be required to fund the Western Link Road. The Council has yet to determine an appropriate approach to the assessment of a Western Link Road 'levy'. The parties reserve the right to provide a site specific assessment of viability at a later date if Western Link Road contributions are excluded from the Local Plan viability evidence base or are assessed to be set on an inappropriate basis.
- 8 The Turley re-appraisal indicates that the SWUE site is viable and capable of delivering 30% affordable housing. The parties will now seek to engage with the Council regarding a fair level of contribution to the Western Link Road and the parties request that the Council takes further advice in order to revise and supplement its evidence base, ensuring that that policy costs applied are realistic, deliverable, and evidenced in accordance with the Framework and Practice Guidance.

8.80 Story considers that it is important to bring these concerns to the Council's attention at this early stage so that these matters are resolved in a collaborative manner between the parties to facilitate this important strategic housing allocation.

# **Appendix 1 Land at Runcorn Road, Higher Walton**



SITE **Land at Runcorn Road,  
Higher Walton**

DRAWING **Location Plan**

DRAWN BY	ABC	DATE	Sept '17
CHECKED BY	-	SCALE	NTS@A3
ISSUE	DRAWING NUMBER	REVISION	

Revisions		
No.	Description	Date

## **Appendix 2 Land Proposed for Green Belt Compliant Uses**



## **Appendix 3 Turley Viability Representation**

**Representation in respect of Warrington  
Borough Council Local Plan Viability  
Assessment**

Peel Holdings (Management) Ltd, Story Homes  
and Ashall Property

June 2019

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## Date

June 2019



# 1. Introduction

## Purpose

- 1.1 This representation is submitted on behalf of Peel Holdings (Management) Ltd, Story Homes and Ashall Property ('the parties').
- 1.2 The parties each have land interests relating to the Warrington Borough Council ('the Council') South West Urban Extension ('SWUE') strategic site. All the parties wholly support the allocation of the SWUE but have concerns with errors, inconsistencies and inappropriate assumptions adopted in the Local Plan Viability Assessment March 2019 ('LPVA'). The parties agree with the Council's conclusion that the SWUE site is viable but have provided comments and requests for alterations to methodology to ensure that the Council's viability assessment of the SWUE allocation site is presented on a robust basis.
- 1.3 The representation has been prepared by Turley, who have substantial experience of preparing viability appraisals in support of a wide range of development proposals throughout the UK. The representation also reflects the parties' knowledge of market conditions through ongoing residential development operations, engagement and negotiations with land owners and developers within Warrington, across the region, and nationally.
- 1.4 Turley previously provided a representation on behalf of Peel in respect of the Warrington Local Plan Viability Assessment Appraisal Inputs ('LPVA-AI') document as dated 1 June 2018 and published by the Council for consultation in July 2018.
- 1.5 This document sets out the parties' representation on the LPVA, which forms part of the evidence base of the Warrington Borough Council Proposed Submission Version Local Plan ('PSLP'), which was published for consultation on 15 April until 5pm on Monday 17 June 2019.
- 1.6 The LPVA was prepared by BNP Paribas Real Estate ('BNP') in order to "*test the ability of developments in the borough to absorb policy requirements in the emerging Local Plan, including the provision of affordable housing*" as proposed within the PSLP.
- 1.7 This representation forms Appendix 2 to the representations prepared on behalf of Peel Holdings (Management) Ltd, Story Homes and Ashall Property in respect of the South West Urban Extension, and should be read alongside and in conjunction with the wider representations.
- 1.8 The parties regard the scheme as viable and deliverable. PSLP Policy DEV2 requires schemes to provide 30% affordable housing and the Turley appraisal at **Appendix 6** indicates that following the adoption of independently assessed on and off site infrastructure costs, the SWUE scheme is viable at 30% affordable housing, subject to future adjustment following the future inclusion of Western Link Road costs.
- 1.9 The LPVA assesses the SWUE site as viable even when providing 40% affordable housing. However following the correction of errors and reassessment of assumptions,

the Turley appraisal at **Appendix 6** indicates that affordable housing at 30% can be accommodated within a viable scheme.

## 2. Representation

- 2.1 This representation sets out the parties' detailed observations to the LPVA, which is the primary document to test that the policy requirements proposed are not a burden on achieving the development that is required to address the identified needs of the Borough and will therefore deliver the plan vision, objectives and spatial strategy.
- 2.2 The LPVA contains errors and omissions including: incorrect gross site area; omission of S106 and accessibility standards costs from appraisals; incorrect/unjustified interest costs; and no allowance for the cost of provided garages. The parties request that the Council takes advice in order to supplement its evidence base, ensuring that the evidence is in accordance with the National Planning Policy Framework ('NPPF')<sup>1</sup>, national Planning Practice Guidance for Viability ('PPGV')<sup>2</sup>, and the recently published RICS Financial viability in planning: conduct and reporting guidance<sup>3</sup>.
- 2.3 Requests for modifications to the LPVA are requested under a series of subject specific headings.

### **Viability in Plan-making**

- 2.4 The Government published amendments to the NPPF in February 2019 and updated PPGV in July 2018, with the most recent PPGV amendments published in May 2019. Both the NPPF and PPGV include an up-to-date position on the Government's intended role for viability assessment, the methodology, and procedures expected of all stakeholders in the preparation of such evidence.
- 2.5 Paragraph 010 of PPGV concisely defines the Government's objective for the role to be played by viability within the planning system:
- "In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission."*
- 2.6 PPGV is clear that the role for viability assessment is primarily at the plan making stage. PPGV Paragraph 002 confirms that the process must be inclusive and undertaken over several stages:
- "Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers."*
- 2.7 PPGV Paragraph 2 also states that policies introduced to the plan should be realistic and deliverable. Specifically:

*"Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the*

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<sup>1</sup> MHCLG (2019) National Planning Policy Framework ('NPPF') (as amended in February 2019)

<sup>2</sup> MHCLG (2019) Planning Practice Guidance for Viability ('PPGV') (as amended in May 2019)

<sup>3</sup> RICS professional standards and guidance, England Financial viability in planning: conduct and reporting 1<sup>st</sup> edition, May 2019

*planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage .”*

- 2.8 PPGV Paragraph 020 confirms that the inputs and findings of any viability assessment should be set out in a way that aids clear interpretation and interrogation by decision makers.
- 2.9 Certain fundamental appraisal assumptions adopted within the LPVA are un-evidenced, or inadequately evidenced. The impact of this is that the results of the LPVA overstate the financial viability of the development site typologies assessed (and hence overstate the ability of development to meet the draft policies within the PSLP), generating excessive levels of affordable housing that have not been mirrored within PSLP policy drafting.
- 2.10 As a result, the LPVA fails to comply with the requirements of the NPPF (and the corresponding PPGV paragraphs). The LPVA has not had correct regard to NPPF paragraph 31 which states:
- 2.11 “...all policies should be underpinned by relevant and up to date evidence. This should be adequate and appropriate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”
- 2.12 It has also not had correct regard to paragraph 34 of the NPPF which states that:
- 2.13 “Such policies [relating to development contributions] should not undermine the deliverability of the plan.”
- 2.14 In summary, elements of PSLP Policy MD3 - South West Urban Extension have not been effectively assessed in accordance with the NPPF and the Government’s PPGV.
- 2.15 It is imperative that the detailed matters raised within this representation, in respect of the LPVA, are addressed by the Council and further advice is obtained in order to supplement the evidence base.
- 2.16 Whilst the parties hold concerns in respect of the approach to large scale scheme modelling adopted within the LPVA, Turley has re-appraised the “SW Extension parcel 1”, as set out in the LPVA, with appraisal assumptions amended in line with the commentary and amendments proposed within this representation.
- 2.17 Following correction of the assumptions, and amendments to a number of other assumptions, the revised appraisal indicates that SWUE parcel 1 is viable following the application of affordable housing and other housing policies, in line with the PSLP. Following the methodology adopted in the LPVA, it can be determined that the remaining parcels of the SWUE site would produce almost identical results. In line with the Turley appraisal at **Appendix 6**, the SWUE site is determined to be viable and capable of fulfilling the Council’s housing policies (to the extent that was tested in the LPVA).
- 2.18 However, it must be noted that the LPVA takes no account of contributions that are anticipated to be required to fund the Western Link Road (‘WLR’). The Council has yet

to determine an appropriate approach to the assessment of a WLR 'levy' but any such contribution will negatively impact upon the viability of the SWUE scheme and, in line with PPGV<sup>4</sup>. The parties wish to work with the Council to establish an appropriate approach to the fair and viable assessment of WLR contributions. The parties reserve the right to provide a site specific assessment of viability at a later date if Western Link Road contributions are excluded from the PSLP viability evidence base, or are assessed to be set on an inappropriate basis.

- 2.19 The parties' representations on technical matters upon which the LPVA relies are set out under the following subheadings, with reference made to the headings and paragraph numbering within the LPVA for ease of cross-reference.
- 2.20 The parties request that the Council obtains further advice to address the matters raised within this representation in order to supplement its evidence base.
- 2.21 Headings and matters requiring clarification or alteration are stated in **bold**.

#### **Previous consultation responses**

- 2.22 There is very limited reference within the LPVA to the Warrington Local Plan Viability Assessment Appraisal Inputs ('LPVA-AI') document as dated 1 June 2018 and published by the Council for consultation in July 2018. BNP stated in the LPVA-AI that "*This note contains our draft inputs for the assessments and invites site promoters for their comments*". Except for a reference to consultation responses in respect of benchmark land values (leading to an increase from £210,000 to £250,000 per gross ha), no further reference is made and, without thorough cross referencing, it is not possible to determine whether BNP has continued to follow the assumptions as set out within the LPVA-AI, or whether any amendments have been made in line with comments received from site promoters or interested parties.
- 2.23 From Turley's review, amendments appear very limited. Turley provided a comprehensive representation document within the consultation period. Consultation responses should be provided along with the Council's feedback within the LPVA, on a transparent basis in line with PPGV<sup>5</sup>.
- 2.24 **To ensure that it is transparent to all parties how comments have been taken forward or discounted it is recommended that the Council prepares a clear schedule of consultation responses and feedback, detailing how comments have been addressed. This request relates to both the LPVA-AI and LPVA.**

#### **Site area**

- 2.25 Of fundamental concern, the LPVA assesses the required level of benchmark land value on the basis of a SWUE gross site area of only 76.5 gross ha. In contrast, the actual SWUE gross site area is 119.6 ha. The Warrington Proposed Submission Version Local Plan states a gross site area of 112 ha.

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<sup>4</sup> MHCLG (2019) PPGV: Paragraph: 007 Reference ID: 10-007-20190509

<sup>5</sup> MHCLG (2019) PPGV: Paragraph: 010 Reference ID: 10-010-20180724

- 2.26 The parties regard it as essential to adopt the full gross site area for the calculation of the benchmark land value. Whilst some areas will not be developed due to site constraints, or use as open space, a cohesive total site area is required and land owners will require payment for all land within the development boundary.
- 2.27 The site includes a Control of Major Accident Hazards (COMAH) zone in respect of uses located on the northern side of the Manchester Ship Canal. According to Health and Safety Executive ('HSE') requirements, this land is not appropriate for residential development, but development for industrial and commercial purposes would be accepted by the HSE. The Illustrative Masterplan shows the COMAH zone land (totalling 18.89 ha (46.68 acres)) providing public open space. The provision of additional green space within the COMAH zone helps limit incursion elsewhere in the green belt, and the COMAH zone is regarded as forming a valid and important part of the total site area.
- 2.28 The LPVA assesses benchmark land values on a gross site area basis and, therefore, with reference to the Illustrative Masterplan, the LPVA under-assesses the SWUE site area by 43.1 ha.
- 2.29 The LPVA states that all strategic site benchmark land values are assessed at £250,000 per ha, whereas site testing is actually assessed at £247,000. The differential between stated and adopted values must be resolved.
- 2.30 If adopting £247,000 per gross ha, this shows that, by reducing the total gross site area, the LPVA over-estimates the SWUE viability by £10,645,700 ( $43.1 \times £247,000 = £10,645,700$ ).
- 2.31 The parties regard the assessed level of benchmark land value as insufficient and, as discussed later within this document, £371,000 per gross ha is regarded as the absolute minimum value expected to incentivise release of land for development.
- 2.32 The LPVA adopts a benchmark land value of £2,699,357 for each parcel but this should be increased to both reflect the total gross site area and an increased £/gross hectare benchmark land value.
- 2.33 The LPVA adopts a total development capacity of 1,600 units, developed within seven parcels of land. Six parcels deliver 250 units and the final provides 100 units. All parcels are assessed at 10.93 ha, providing a total gross site area of 76.51 ha. The net parcel site area is stated within LPVA Appendix 1 at 8.33 ha, providing a total net developable area of 58.31 ha. The adoption of an identical site area for the 100 unit parcel is incorrect, generating reduced viability, and site areas should be re-assessed on a pro-rata basis, in line with residential and commercial delivery modelling.
- 2.34 On the basis of a corrected total gross site area of 119.6 ha, the 250 unit parcels can be calculated on a pro-rata basis to generate a gross site area of 18.69 ha, and the 100 unit parcel is assessed at 7.48 ha.
- 2.35 Based on the total gross site area of 119.6 ha, the total net developable area of 58.31 ha equates to a net:gross ratio of circa 49%, which is regarded as reasonable and appropriate for a scheme of significant scale.

- 2.36 **The parties request that a corrected site area is adopted and the differential between the stated and adopted BLV requires amendment.**

**S106 and accessibility standards costs**

- 2.37 The LPVA appraisal methodology states that costs relating to S106 and accessibility standards are included. However, upon review of the appraisals within LPVA Appendix 5 it can be calculated that the total development cost calculation is generated from the addition of only: build costs including contingency; fee; and sales and marketing. S106 and accessibility standards costs are excluded from the total costs.
- 2.38 In line with PPGV<sup>6</sup>, the Council needs to transparently set out the S106 and accessibility standards costs. It is considered at present that the LPVA viability assessment showing 40% affordable housing as viable is exaggerated within each of the scheme parcel appraisals. Therefore, the levels of affordable housing that are proposed to be viable within the LPVA are incorrect and the conclusions misleading.
- 2.39 **Correction of the omission of costs and a breakdown of S106 costs are requested.**

**Benchmark land value**

- 2.40 The LPVA states that benchmark land values ('BLV') equating to £371,000 per gross hectare (c.£150,000 per gross acre) are adopted, except for sites of a "*strategic nature*"<sup>7</sup>, which are stated to be assessed at £250,000 per gross hectare. The parties disagree with this approach.
- 2.41 LPVA Tables 5.1.4 and 5.1.5 show the results of testing all sites at the higher and lower benchmark land values and it is not possible to easily determine which BLV has been adopted for each site in reaching conclusions.
- 2.42 The LPVA appraisals test viability against a benchmark of £247,000 per gross hectare rather than the stated £250,000 per gross hectare (c. £101,000 per gross acre).
- 2.43 Within the LPVA, the BLV is assessed with reference to: a historic DCLG document from 2011; viability assessments that BNP has seen; consultation responses to the LPVA-AI in 2018; and consultation with the Valuation Office Agency.
- 2.44 Other than the historic DCLG document, no transparent evidence is provided within the LPVA to support the proposed BLVs.
- 2.45 It must be noted that the whilst the DCLG document does reference land values of £100-150,000 per gross acre, it concludes as follows: "*Consequently, we would recommend that minimum land value requirements of at least £200,000 per gross, and £400,000 per net, acre are assumed for release of 'greenfield' land*". LPVA paragraph 4.2.17 references the former figures, but not the latter.

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<sup>6</sup> MHCLG (2019) PPGV: Paragraph: 010 Reference ID: 10-010-20180724

<sup>7</sup> LPVA paragraph 4.2.17

- 2.46 PPGV<sup>8</sup> states that “Market evidence can also be used as a cross-check of benchmark land value but should not be used in place of benchmark land value. There may be a divergence between benchmark land values and market evidence; and plan makers should be aware that this could be due to different assumptions and methodologies used by individual developers, site promoters and landowners.

*This evidence should be based on developments which are fully compliant with emerging or up to date plan policies, including affordable housing requirements at the relevant levels set out in the plan. Where this evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic benchmark land values of non-policy compliant developments are not used to inflate values over time.”*

- 2.47 Crucially, PPGV confirms that the BLVs set must reflect the “...reasonable expectations of local landowners”<sup>9</sup>.
- 2.48 The LPVA has not followed the methodology set out in PPGV in preparing the BLV, as the Valuation Office Agency evidence and consultation responses have not been made available on a transparent basis.
- 2.49 The parties regard the strategic site value of £247,000 per gross hectare as insufficient and without the required evidential support or justification. Instead, the parties consider that the upper range figure of £371,000 per gross ha represents the absolute minimum value expected to incentivise release of land for development.
- 2.50 **In line with PPGV, the parties request that WBC reviews land sale and planning application/permission evidence in order to form appropriate benchmark land values for green field and brownfield land, re-weighted for policy compliance.**
- 2.51 **The parties request that WBC further engage with landowners, promoters and developers to rectify the concerns raised by effectively establishing and seeking to agree appropriately evidenced BLVs, which will be sufficient to incentivise local market delivery, prior to the Examination of the PSLP. PPGV is clear on the importance of this process in ensuring the evidence base is robust. It states:**

***“In order to establish benchmark land value, plan makers, landowners, developers, infrastructure and affordable housing providers should engage and provide evidence to inform this iterative and collaborative process.”***<sup>10</sup>

#### **Interest costs**

- 2.52 Interest on build and interest on land included within the LPVA appraisals appear high. For example SW Extension parcel 1 includes total interest costs of £5,616,273, whereas the Turley appraisal of the same parcel generates an interest total of £764,131. It is unclear why this difference has emerged.

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<sup>8</sup> MHCLG (2019) PPGV: Paragraph: 014 Reference ID: 10-014-20190509

<sup>9</sup> MHCLG (2019) PPGV: Paragraph: 016 Reference ID: 10-016-20190509

<sup>10</sup> MHCLG (2019) PPGV: Paragraph: 013 Reference ID: 10-013-20190509



2.53 **Explanation of the LPVA methodology should be provided for transparency.**

**Sales values**

- 2.54 The assessment of private sales values within the LPVA is based on new build comparable research, but there is a lack of clarity as to how the comparables have generated the values adopted within the viability testing.
- 2.55 No reference is made to the prevailing sales values generated within areas of the borough to ensure that values are applied in line with market expectations. Such evidence could be provided via Land Registry mapping and such evidence is regarded as important when directly comparable information is very limited.
- 2.56 No mapping of the comparable data is provided to establish the context for value assessment and to provide transparent evidence as required by PPGV<sup>11</sup>.
- 2.57 Turley has completed a market review that is bespoke to the SWUE, as attached at **Appendix 1**, and we determine an average market sale value equating to c.£250-260 psf (£2,691-2,799 psm) as appropriate for the SWUE site.
- 2.58 Within appraisals attached at **Appendices 4 and 5**, an average market value equating to £260 psf (£2,799 psm) has been adopted.
- 2.59 **The parties request that in the interest of transparency that reasoning and evidence is provided within the LPVA to support the values that have been adopted.**

**Affordable housing values**

- 2.60 LPVA paragraph 4.2.3 sets out abbreviated calculations/justification for values adopted for affordable rent and shared ownership tenures. No cross reference of the results is made to opinions obtained from registered providers of affordable housing.
- 2.61 Based on an average sales value equating to £2,799 psm (£260 psf), the affordable housing values adopted within the LPVA equate to 51.7% of market value ('MV') for affordable rent and 70% for shared ownership.
- 2.62 The parties have held direct discussions with Registered Providers ('RP') in the north west of England. At the present time, the parties understand that offers will generally be received at values equating to 30-50% of MV for affordable rented, and 60-70% for intermediate (shared ownership) dependent upon location.
- 2.63 Affordable housing values are assessed at levels in excess, or at the limits of expectations without evidence, or appropriate reasoning.
- 2.64 **Clarification of all affordable housing assessment inputs is requested, for example details of the market values adopted for the assessment of shared ownership units and the source of the "Indicative Rent" levels adopted in the affordable rent assessment. In line with NPPF Paragraph 35, the values should be based on**

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<sup>11</sup> MHCLG (2019) PPGV: Paragraph: 010 Reference ID: 10-010-20180724

**proportionate evidence, and comparison to opinions from Registered Providers should also be provided.**

#### **Base construction costs**

- 2.65 Reference is made to RICS BCIS lower quartile construction cost data, and cost information received by the Council, but the source of the adopted costs is not clearly defined.
- 2.66 Planning Practice Guidance - Viability ('PPGV') states that RICS BCIS is an appropriate data source for local plan viability testing..
- 2.67 For the purposes of consistency, at this stage, Turley has regarded the base build costs adopted by the LPVA as reasonable and does so on a without prejudice basis until clarification of the source of costs is provided.
- 2.68 The parties request that the source of construction costs is clearly defined and evidenced in order to improve transparency in line with PPGV.

#### **Garages**

- 2.69 No reference is made to the cost of constructing garages within the LPVA.
- 2.70 Costs of garage construction fall outside base and external works costs and their exclusion must be corrected, with garages included within scheme typologies in line with market expectations, and evidenced by reference to the level of provision within permitted schemes.
- 2.71 The omission of garages will significantly inflate scheme viability as the sales values adopted will be based on the higher values generated by units with garages. More fundamentally, scheme construction costs are under estimated.
- 2.72 **Correction of this omission is requested. It is expected, as a minimum that all detached houses will be allocated a detached or attached single garage.**

#### **Infrastructure costs**

- 2.73 On site infrastructure/utilities costs and off site infrastructure/highways costs within the LPVA total £26,586 per unit for the SWUE site. LPVA paragraph 4.2.6 makes reference to BNP's "*experience from major sites elsewhere*" and states that the "*Council has provided additional infrastructure costs for the four strategic*".
- 2.74 No evidence is provided to support the adopted costs, which are higher than the costs assessed by Ryder Levitt & Bucknall ('RLB') at £18,878 per unit (excluding WLR), as issued to the Council in correspondence from Turley dated 4 March 2019. A copy of the RLB Cost Report is attached at **Appendix 2**.
- 2.75 Within the Turley appraisal at **Appendix 4** it is assumed that on site infrastructure costs will increase on a pro-rata basis at £7,986 per unit, in line with the increased number of assessed residential units. Total strategic infrastructure costs are assumed to remain

unchanged, with the total LPVA cost of £4,766,000 (£19,064 per unit x 250 units) equating to £16,322 per unit on the basis of a 292 unit scheme.

- 2.76 **On the basis of the currently available information, the infrastructure and utilities costs appear disproportionate in respect of the SWUE site. Clarification of the sources of costs, and supporting evidence is requested. Consideration should be given to the RLB Cost Report attached at Appendix 2.**

#### **Western Link Road ('WLR') contributions**

- 2.77 No reference is made within the LPVA to the potential need for contributions relating to the WLR. We understand from the Council that no WLR allowance has been included within the Council's viability assessments.
- 2.78 PSLP Policy MD3 requires the SWUE site to provide "*a contribution towards a strategic transport infrastructure (the Western Link).*" It is, therefore, essential that appropriate costs relating to the WLR are taken into account as the development of the SWUE cannot come forward until funding and a programme for delivery of the WLR are confirmed, in line with PSLP paragraph 10.3.7.
- 2.79 The viability of the SWUE site cannot be fully assessed until WLR costs are included in the assessment. Therefore, it will be necessary to anticipate that a scheme specific viability assessment will be submitted at application stage, in line with PPGV<sup>12</sup>, unless WLR costs are introduced into the PSLP viability evidence.
- 2.80 **A clear statement is required from the Council in respect of the proposed approach to the assessment of WLR contributions to ensure that PSLP viability testing is provided with reference to proportionate evidence in line with NPPF paragraph 35.**

#### **Unjustified Professional fees**

- 2.81 Professional fees are considered to be insufficient at 6% of total construction costs. The parties consider that a 7% allowance is regarded as appropriate.
- 2.82 **The parties request that professional fees are incorporated within the LPVA appraisals at rates which reflect development reality, with a 7% allowance regarded as the minimum appropriate provision for Local Plan viability assessment purposes in respect of large scale strategic sites.**

#### **Development Period/Sales rates**

- 2.83 The LPVA states a sales rate of between 10 and 16 units per month (excluding affordable units), which is excessive, but the Viability Appraisal appears to adopt a sales rate of circa 7.3 sales per month for the SWUE, which is regarded as appropriate on the basis of a multi sales outlet development. The appraisals at LPVA Appendix 5 states that the build period and sales period are identical, which is regarded as inappropriate. The residential sales period must be preceded by a construction period

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<sup>12</sup> MHCLG (2019) PPGV: Paragraph: 007 Reference ID: 10-007-20190509

of a minimum of six months, albeit this would not reflect the initial period of infrastructure development that would be required for the SWUE site.

- 2.84 Whilst reference is made to build and sales periods within LPVA Appendix 1: Site allocation appraisal inputs, the information provided does not provide clarity in respect of the adopted appraisal cashflow.
- 2.85 **Clarification is required via provision of cashflows to accompany viability appraisals. Residential sales cannot commence at the same time as the construction period and revisions are required.**

#### **Section 106 costs**

- 2.86 The LPVA provides no detail in respect of the breakdown of costs included within the S106 allowance.
- 2.87 **In line with PPGV<sup>13</sup>, the Council's evidence needs to demonstrate, in a transparent way, how all of the Policy requirements within the draft plan have been factored into the Assessment on an item by item basis, including relevant infrastructure requirements.**

#### **Appraisal cashflows**

- 2.88 The LPVA provides appraisal summaries, which include insufficient detail for full due diligent review. For example, total construction costs are provided but with no breakdown of individual costs. No cash flows are provided, meaning that the construction period, sales period and timings for all costs cannot be appropriately assessed.
- 2.89 **The LPVA must be provided on a transparent basis, in line with PPGV<sup>14</sup>, as further discussed below. The parties request that full scheme appraisals and cashflows are provided within the LPVA.**

#### **Developers Profit**

- 2.90 In the LPVA-AI, BNP proposed a developer's profit of 17.5% and Peel's previous submitted representation stated that a profit of 20% of GDV should be adopted. The LPVA adopts a reduced market sales profit of 17% of GDV. Current PPGV indicates a range of 15-20% but it is widely accepted that national housing developers require a minimum profit level of 20% for speculative development, and those involved in strategic site development often require greater returns to reflect the high level of up-front cost commitment, which generates higher levels of risk.
- 2.91 **It is requested that the profit level should be adjusted to 20% to match market expectations.**

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<sup>13</sup> MHCLG (2019) PPGV: Paragraph: 010 Reference ID: 10-010-20180724

<sup>14</sup> MHCLG (2019) PPGV: Paragraph: 010 Reference ID: 10-010-20180724

### Indexation rates

- 2.92 The LPVA includes sensitivity testing based on annual sales value increases of 5% and build cost increases of 2%. The sales value inflation rate is regarded as excessive inflation rates are not evidenced or justified.
- 2.93 **Transparent evidence and reasoning is requested to support the proposed index rates.**

### Scheme typology

- 2.94 No unit mixes, unit sizes, or discussion of development density are provided in the LPVA. There is, therefore, no transparency in respect of the adopted assumptions. A black box approach is not compliant with NPPF or PPGV, and provision of detailed information and supporting evidence is regarded as essential.
- 2.95 Paragraph 57 of the NPPF confirms that transparency in the preparation of all viability assessments is essential. It states:
- “All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.”*
- 2.96 PPGV elaborates on the NPPF by confirming the importance of transparency for improving data availability and accountability:
- “Any viability assessment should follow the government’s recommended approach to assessing viability as set out in this National Planning Guidance and be proportionate, simple, transparent and publicly available. Improving transparency of data associated with viability assessment will, over time, improve the data available for future assessment as well as provide more accountability regarding how viability informs decision making.”<sup>15</sup>*
- 2.97 **Clearly defined scheme typologies are essential to enable due diligent review and clarification of unit the mixes, unit sizes, and development density is requested for each typology.**

### Development area density

- 2.98 Whilst it is not clearly stated, from information provided in the LPVA, development densities and average unit sizes can be calculated at 30 dwellings per net ha (12.14 dwellings per net acre) and 1,254 sq ft per unit.
- 2.99 The development density matches the minimum set out PSLP Policy MD3.3 and generates a scheme density of 15,231 sq ft per net acre. LPVA Appendix 1 states site coverage of 76%, with SWUE parcels providing 10.93 gross has and 8.33 net ha. The adopted level of net:gross site ratio does not reflect the reality of strategic site delivery where sites will often return a net:gross ration of circa 45-60%, and the adopted gross site area is incorrect.

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<sup>15</sup> MHCLG (2019) PPGV: Paragraph: 010 Reference ID: 10-010-20180724

- 2.100 **It is essential that an accurate total gross area is adopted along with a significantly reduced net:gross ratio, to reflect anticipated SWUE delivery, with development density increased to circa 35 dwellings per net ha and average unit sizes reduced to match market expectations.**

#### **NDSS scheme density/typology**

- 2.101 The LPVA states that *“All the appraisals incorporate sufficient gross internal floorspace to meet the space standards set out in ‘Technical housing standards – nationally described space standard’ (MHCLG, 2015)”*.
- 2.102 The PSLP contains no requirement for residential development to meet nationally described space standards (‘NDSS’). As a result of the adopted assumption, the average unit size is significantly larger than market expectations, and development density is lower than real world delivery.
- 2.103 The development of units that are larger than general market delivery will impact upon levels of purchaser demand and pricing, with demand decreasing due to higher unit pricing in comparison to non-NDSS units of the same bed number.
- 2.104 Purchasers do not pay the same £psf rate for larger units when compared with smaller units of the same bed number.
- 2.105 **Clarification is required in respect of reason for use of NDSS unit sizing, with reductions in £ psm pricing required to reflect NDSS unit sizing. The NDSS scheme is not supported by appropriate evidence and it is requested that appraisals are re-modelled on the basis of current scheme delivery in Warrington as assessed from on-going and recent planning permissions.**

#### **Scheme modelling**

- 2.106 The large scale strategic appraisals are provided on the basis that the sites are split into development parcels, each providing 250 units, with the final parcel providing a 100 units to make up the total scheme delivery number.
- 2.107 The methodology assumes that infrastructure costs are evenly split across the whole development period, but this does not reflect the reality of delivery where infrastructure costs will be front loaded. The adopted approach is regarded as simplistic.
- 2.108 **Revised cashflow modelling is requested, with front loading of infrastructure at 50% prior to 1st sale, and the remaining 50% prior to half the sales regarded as a more appropriate assumption.**

#### **Care Home**

- 2.109 PSLP Policy MD3 requires the SWUE site to provide a *“residential care home (Use Class C2) providing a minimum of 80 bedrooms”*.
- 2.110 The LPVA makes no reference to the care home requirement and it is regarded as essential that the viability of all proposed PSLP policies are fully assessed.

- 2.111 **The parties will seek to remove the absolute requirement for a care home during the PSLP consultation process, but re-assessment of SWUE scheme viability is requested to accurately reflect proposed PSLP policies.**

#### **Custom and self-build plots**

- 2.112 PSLP Policy MD3 requires the SWUE site to provide a range of housing tenures, types and sizes, including “*custom and self-build plots*”.
- 2.113 The LPVA makes no reference to custom and self-build plots and it is regarded as essential that the viability of all proposed PSLP policies are fully assessed.
- 2.114 **Re-assessment of SWUE scheme viability is requested to accurately reflect proposed PSLP policies.**

#### **Site area**

- 2.115 Six of the seven assumed SWUE development parcels are shown to be viable with a 40% affordable housing provision with a benchmark land value of £247,000 per gross ha, with the final parcel of 100 units viable with a 20% affordable housing provision.
- 2.116 The reduced affordable housing provision in the 100 unit parcel is due to the use of a gross site area that matches the area adopted for 250 units, and the excessive site area generates reduced viability.
- 2.117 **This lack of attention to detail is of concern and all scheme parcel site areas should be reassessed, with the site area adjusted on a pro-rata basis, in line with residential unit numbers. On the basis of the actual gross site area of 119.6 ha, and the LPVA modelled delivery of 1,600 units, a pro-rata allocation of site area will generate a site area of 18.69 ha for parcels 1-6 and 7.48 ha for parcel 7.**

#### **Turley re-appraisal**

- 2.118 Taking into account the comments made above, Turley has re-run the SWUE parcel 1 appraisal of 250 units, with assumptions amended in line with the approach and inputs advocated by Turley and the interested parties, including a parcel gross site area of 18.69 ha.
- 2.119 A summary of the amended assumptions is set out within the table attached at **Appendix 3**. This provides comparison with the LPVA assumptions. The LPVA Appendix 5 appraisal layout has been retained for simplicity.
- 2.120 The updated SWUE parcel 1 appraisal is attached at **Appendix 4** and has been prepared by Turley on behalf of the interested parties. The appraisal and supporting cashflow have been produced using Argus Developer; a widely respected proprietary appraisal software package.
- 2.121 The scheme has been assessed at a market facing density of 35 dph, with an average unit size of 1,025 sq ft (95.22 sq m) per unit. Affordable units are assumed to comprise 2-bed and 3-bed units only, at an average unit size of 800 sq ft (74.32 sq m). Our understanding is that national house builders will target site coverage at circa 14,500

sq ft per net acre in medium to higher value areas. Therefore, the assumed development has been assessed with site coverage at 14,541 sq ft per net acre (3,338 sq m per ha). This is in line with market expectations, as evidenced by the ongoing developments by Barratt Homes at Stretton, Warrington. The Barratt Homes site plan from planning application reference no. 2018/32672 is attached at **Appendix 5**, and the accommodation schedule shows site coverage at 14,688 per net acre.

- 2.122 The LPVA (30% affordable housing) appraisal generates a residual land value of £5,693,562 and, when compared with the benchmark land value (BLV) of £2,699,357 proposed within the LPVA, the parcel is determined to be viable by BNP. However, as referenced earlier, the appraisal does not account for costs relating to S106 and accessibility standards (totalling £2,445,225), it does not include costs relating to garage construction, but does include seemingly excessive interest costs totalling £5,616,273.
- 2.123 In comparison, the Turley appraisal generates a residual land value of £5,507,333, equating to £119,250 per gross acre (£294,667 per gross ha). When assessed against the BLV advocated by Turley (of £150,000 per gross acre; £371,000 per gross ha), the parcel appraisal is shown to be unviable when delivering 30% affordable housing<sup>16</sup>.
- 2.124 During the site assessment process, the interested parties instructed Ryder Levett Bucknall ('RLB') to provide a cost assessment in respect of on site and off site infrastructure requirements (excluding WLR costs). A copy of the RLB Cost Report is attached at **Appendix 2**. A copy of the Cost Report was provided to the Council on 4 March 2019, but has not been referenced in the LPVA.
- 2.125 The Cost Report relates to the whole SWUE site and generates total costs equating to £18,868 per unit (based on 1,850 units). This is lower than the LPVA costs equating to £27,050 per unit.
- 2.126 Turley has completed a second Argus Developer appraisal, as attached at **Appendix 6**, with assumptions unchanged from **Appendix 4** except for the adoption of infrastructure costs in line with the RLB Cost Report. The appraisal generates a residual land value of £7,008,699, equating to £151,759 per gross acre (£374,997 per gross ha), which is in line with the benchmark land value, indicating that the scheme is viable with 30% affordable housing when assessed against a benchmark land value equating to £150,000 per net acre (£371,000 per hectare).
- 2.127 However, this is before making any cost allowance for contribution towards the provision of the WLR, which is regarded as a critical piece of infrastructure for delivery of the SWUE.
- 2.128 The Council has confirmed that the LPVA does not include any allowance for WLR contributions.

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<sup>16</sup> Note: the Argus Developer appraisal produces a slightly different residual land value due to the calculation of purchaser's costs.



- 2.129 Appropriate modelling of the impact of costs relating to the WLR is regarded as essential to ensure that the Local Plan is assessed with reference to an appropriate evidence base in line with NPPF paragraph 35.
- 2.130 PPGV states that “*As far as possible, costs [including site-specific infrastructure costs] should be identified at the plan making stage*”. The parties reserve the right to provide a site specific assessment of viability at a later date if Western Link Road contributions are excluded from the PSLP viability evidence base, or are assessed to be set on an inappropriate basis.

### **Summary**

- 2.131 Through the omission or understatement of critical costs, the LPVA generates excessive levels of viability, with SWUE parcels 1-6 generating a viability buffer with the provision of 40% affordable housing, which is regarded as inappropriate and unjustified.
- 2.132 The Turley reappraisal indicates that the SWUE site is viable and capable of delivering 30% affordable housing. The parties will now seek to engage with the Council regarding a fair level of contribution to the Western Link Road and the parties request that the Council takes further advice in order to revise and supplement its evidence base, ensuring that that policy costs applied are realistic, deliverable, and evidenced in accordance with the NPPF and PPGV.

## **Appendix 1: Turley Residential Market Review**

# **Warrington South West Urban Extension Residential Market Report**

Prepared on behalf of:

Peel Holdings (Management) Ltd, Story Homes  
and Ashall Property

May 2019

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**Client**  
Peel Holdings (Land and Property) Limited

**Date**  
May 2019

# 1. Introduction

## **Purpose**

- 1.1 This report has been prepared by Turley Development Viability on behalf of Peel Holdings (Management) Ltd, Story Homes and Ashall Property ('the parties'). The report provides an independent residential market assessment relating to the promotion of the South West Urban Extension land to the north of the A56 at Higher Walton (the 'subject site').
- 1.2 The report will be utilised as a guide for the assessment of market pricing for comparison with that proposed in Warrington Council's Local Plan viability evidence.

## **Site Location**

- 1.3 The subject site comprises 109.77 hectares of land and is situated to the south-west edge of the town of Warrington, directly west of the village of Walton.
- 1.4 To the west of the subject site are raised railway lines (West coast line and Chester-Manchester line) which form physical and visual boundaries to the land. To the south is Bridgewater Canal, which provides high quality amenity and recreation spaces. Chester Road (A56) defines the eastern boundary of the site, connecting it to Warrington (north), the M56 (south) and the M6 (east). The Manchester Ship Canal lies to the north of the site, and it defines the northern boundary of the site.
- 1.5 To the north, across the Manchester Ship Canal, are several major industrial structures which require hazardous substances consideration. The site directly north, considered a top tier 'Control of Major Accidents and Hazards' (COMAH), is located at the end of Baronet Road and is owned by Solvay Interlox Ltd and the site produces hydrogen peroxide. Development upon the subject site is restricted in close proximity to these nearby uses.

## **Site Description**

- 1.6 The subject site forms the Warrington South West Urban Extension (SWUE), part of the council's 'Preferred Development Option'. The area is defined by its surrounding transport infrastructure and a developable area that has the capacity to deliver a large scale sustainable mixed-use development of circa 1,800 homes and community facilities and open space. The site offers a natural urban extension to the south-west of the town of Warrington.
- 1.7 The subject site is predominately greenfield with the majority of land currently in agricultural use. There are six existing on-site structures which are locally listed, two of which are residential properties [to the south of Mill Lane].

## **Methodology**

- 1.8 The report has been informed by a review of published market intelligence and local evidence, a review of housing market and transactional data, and also draws upon a

market engagement exercise with developers currently marketing comparable new residential schemes in the local area.

- 1.9 The data utilised within this report was originally gathered in December 2018 and has been updated in May 2019.
- 1.10 This report is not plot specific, does not constitute a valuation, and cannot be regarded, or relied upon as a valuation as it falls outside of the RICS Valuation – Professional Standards (Red Book). It is to be used as price guidance only.
- 1.11 Some of the data incorporated in this report has been supplied by third party sources, the accuracy of which cannot be assured. Turley shall not be liable for any special, indirect or consequential damages arising from the use of this report, including loss of profit.

## 2. Residential Re-sale Market

### Commentary

- 2.1 There is a significant, positive opportunity for Warrington to contribute towards housing land supply requirements via the SWUE and to deliver a sustainable community with approximately 1,800 new homes.
- 2.2 Acknowledging the potential for a large scale residential mixed-use development, we have undertaken a review of the local residential markets, to the south of the Manchester Ship Canal, to determine levels for recent transactional values.

### Average Prices

- 2.3 According to the latest data from the UK House Price Index, for February 2019, the average property price in England was £242,963 (0.4% annual change) and the average property price for Warrington was £195,887 (3.9% annual change)<sup>1</sup>. According to Zoopla, the current average property price paid in Warrington, as at May 2019, was £206,808, based upon a recorded sales volume of 2,819.
- 2.4 For the area of Walton, the nearest locality in proximity of the subject site, the average price paid was £381,976 (based upon 17 transactions), according to Zoopla. Current average values for property have risen 1.73% over the past 12 months.

### Walton Area

- 2.5 An independent review of re-sale properties within streets to the western fringe of Walton (closest to the subject site) was undertaken in December 2018 and updated in May 2019, and utilised sold price data from Land Registry. This data has been cross referenced with Energy Performance Certificate (EPC) data to obtain unit size data, where possible.
- 2.6 This spatial area of Walton is considered most likely to be appropriate for benchmarking pricing within the south-west of Warrington given its proximity to the subject site and a likelihood that this existing stock will directly compete with new homes for sale.
- 2.7 This assessment included a range of properties that have sold in the roads closest to the subject site. Comparables vary by type and age, with the oldest properties generally built in the 1930s. The average prices achieved over the period from December 2017 to May 2019 are summarised as follows:

- 3-bed terraced: £273,750 or £229/ft<sup>2</sup>
- 3-bed semi-detached: £333,478 or £250/ft<sup>2</sup>
- 4-bed semi-detached: £434,375 or £246/ft<sup>2</sup>

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<sup>1</sup> <https://www.gov.uk/government/publications/uk-house-price-index-england-february-2019/uk-house-price-index-england-february-2019>

- 4-bed detached: £650,867 or £311/ft<sup>2</sup>

2.8 A summary of the recorded re-sale properties matching the above criteria is displayed within **Table 2.1:** below.



**Table 2.1: Walton Re-sale Properties: December 2017 – March 2019**

Date From	Date To	Address	Accommodation Type	No. Sales	Average Size (ft <sup>2</sup> )	Total Size (ft <sup>2</sup> )	Total Revenue	Average Sold Price	£ /ft <sup>2</sup>
08/06/2018	09/07/2018	Brackley Street	3-bed terraced	2	1,211	2,422	£583,000	£291,500	£241
28/02/2018	22/11/2018	Ellesmere Road	3-bed terraced	4	1,187	4,747	£1,059,500	£264,875	£223
<b>3-bed Terraced Summary:</b>				<b>6</b>	<b>1,195</b>	<b>7,169</b>	<b>£1,642,500</b>	<b>£273,750</b>	<b>£229</b>
12/03/2018	12/03/2018	Algernon Street	3-bed semi	1	1,002	1,002	£254,000	£254,000	£253
06/06/2018	06/06/2018	Brackley Street	3-bed semi	1	1,496	1,496	£385,000	£385,000	£257
27/04/2018	27/04/2018	Osborne Road	3-bed semi	1	1,079	1,079	£280,000	£280,000	£260
04/05/2018	15/02/2019	Stetchworth Road	3-bed semi	2	1,254	2,508	£620,000	£310,000	£247
06/02/2019	06/02/2019	Walton Heath Road	3-bed semi	1	936	936	£315,000	£315,000	£336
31/08/2018	31/08/2018	Westbourne Road	3-bed semi	1	1,012	1,012	£400,000	£400,000	£395
18/12/2017	25/01/2019	Worsley Road	3-bed semi	3	1,299	3,897	£1,080,781	£360,260	£277
<b>3-bed Semi-detached Summary:</b>				<b>10</b>	<b>1,193</b>	<b>11,930</b>	<b>£3,334,781</b>	<b>£333,478</b>	<b>£280</b>
22/11/2018	22/11/2018	Grantham Avenue	4-bed semi	1	1,938	1,938	£492,500	£492,500	254
06/04/2018	01/08/2018	West Avenue	4-bed semi	2	1,539	3,078	£740,000	£370,000	£240
14/06/2018	14/06/2018	Whitefield Road	4-bed semi	1	2,056	2,056	£505,000	£505,000	£246
<b>4-bed Semi-detached Summary:</b>				<b>4</b>	<b>1,768</b>	<b>7,072</b>	<b>£1,737,500</b>	<b>£434,375</b>	<b>£246</b>
06/02/2019	06/02/2019	Hillcliffe Road	4-bed detached	1	2,368	2,368	£750,000	£750,000	£317
23/01/2018	12/10/2018	Walton Road	4-bed detached	2	1,951	3,902	£1,202,600	£601,300	£308
<b>4-bed Detached Summary:</b>				<b>3</b>	<b>2,090</b>	<b>6,270</b>	<b>£1,952,600</b>	<b>£650,867</b>	<b>£311</b>
<b>Summary:</b>				<b>24</b>	<b>1,400</b>	<b>33,603</b>	<b>£9,167,381</b>	<b>£381,974</b>	<b>£273</b>

Source: Land Registry

***Appleton Area***

- 2.9 The civil parish of Appleton, another suburb of Warrington, which is located on the south-eastern boundary of Walton, is considered to attract a price premium, with the average price paid over the past 12 months at £393,614, according to Zoopla.
  
- 2.10 Within one mile of the subject site, and separated by only the Walton Hall golf course, is a relatively new development known as The Hamptons, in Appleton. With this development being within close proximity to the subject site, transactional research was undertaken to determine sold prices within approximately the last 12 months, for what is regarded as a more aspirational price point within the area.
  
- 2.11 A summary of the recorded re-sale properties is displayed within **Table 2.1:** below.

**Table 2.2: 'The Hamptons' Re-sale Properties: March 2018 – January 2019**

Date From:	Date To:	Address	Accommodation Type	No. Sales	Average Size (ft <sup>2</sup> )	Total Size (ft <sup>2</sup> )	Total Revenue	Average Sold Price	£ /ft <sup>2</sup>
21/12/2018	21/12/2018	Field Lane	3-bed detached	1	1,787	1,787	£640,000	£640,000	£358
<b>3-bed Detached Summary:</b>				<b>1</b>	<b>1,787</b>	<b>1,787</b>	<b>£640,000</b>	<b>£640,000</b>	<b>£358</b>
14/03/2018	06/04/2018	Field Lane	4-bed detached	2	1,991	3,983	£1,335,000	£667,500	£335
<b>4-bed Detached Summary:</b>				<b>2</b>	<b>1,991</b>	<b>3,983</b>	<b>£1,335,000</b>	<b>£667,500</b>	<b>£335</b>
27/04/2018	27/04/2018	Bellcast Close	5-bed detached	1	2,928	2,928	£780,000	£780,000	£266
07/01/2019	07/01/2019	Field Lane	5-bed detached	1	2,874	2,874	£900,000	£900,000	£313
28/09/2018	22/10/2018	High Warren Close	5-bed detached	2	3,019	6,039	£1,595,000	£797,500	£264
<b>5-bed Detached Summary:</b>				<b>4</b>	<b>2,960</b>	<b>11,840</b>	<b>£3,275,000</b>	<b>£818,750</b>	<b>£277</b>
<b>Scheme Summary:</b>				<b>7</b>	<b>2,516</b>	<b>17,610</b>	<b>£5,250,000</b>	<b>£750,000</b>	<b>£298</b>

Source: Land Registry

## 3. Residential New Build Market

### Local Residential New Build Market

- 3.1 In order to benchmark local market performance for new build developments, and inform pricing at the subject site, a review of comparable new build housing sites was undertaken during December 2018 and updated in May 2019.
- 3.2 Analysis has focused on sites located to the west and south-west of the subject site, within a 3 mile radius of the area boundary.
- 3.3 The following report sets out details of the nearest developments including an assessment of available homes (where available) and achieved sales, based on evidence from Land Registry data, engagement with the developers directly, and a review of online marketing, planning application and EPC data.
- 3.4 A total of six sites form the basis of this assessment.

### Hatters Close, Daresbury

- 3.5 The 'Land at Daresbury Village', marketed as Hatters Close, Daresbury, is a small, private development of five dwellings, comprising of 4-bed semi-detached and detached units.
- 3.6 The site is within 2 miles of the subject site, to the south-west. The site area is 0.32 hectares (ha) and was previously greenfield, bounded by Daresbury Primary School to the south and buildings, including a tea rooms, to the north. The site abuts the Chester Road to the east.
- 3.7 A planning permission (Ref: 16/00428/FUL) was granted in July 2017 and the development is currently being marketed by Meller Braggins and Bridgfords estate agents.

### Availability & Asking Prices

- 3.8 As at December 2018 there were three 4 bed semi-detached properties being marketed at asking prices of £475,000 (£362/ft<sup>2</sup>)

- 4-bed semi-detached: £475,000 or £362/ft<sup>2</sup>

### Achieved Sales

- 3.9 No achieved sales have been recorded by Land Registry at the time of publication.

### Comparison to Subject Site

- 3.10 The scheme is in relatively close proximity to the subject site, however, Daresbury settlement is relatively small, as is the Hatters Close development. Hatters Close comprises only two house types, which each provide four bedrooms, and considering the exclusive nature of the scheme and the premium values achieved in Daresbury, this scheme is regarded as providing little useful data for comparison. All properties are currently being marketed at a premium rate, with a private developer looking to push values.

### Hatters Park, Laurus Homes

- 3.11 Hatters Park is a development of 18 dwellings located on Manor Farm Road, Runcorn, and comprises a mix of 3 and 4-bed, terraced, semi-detached and detached properties.
- 3.12 The 0.53 hectare site is located approximately 2.25 miles to the west of the subject site and three miles east of Runcorn Town Centre. The area immediately to the north and east of the site is woodland, known as Lodge Plantation (a Woodland Trust woods). The land to the west of the site has been redeveloped into 14 mews houses. Immediately to the south of the site is a small business park.
- 3.13 The planning permission (ref: 14/00665/FUL) was granted in April 2015 and the site is currently under construction and being marketed by Laurus Homes.

### Availability and Asking Prices

- 3.14 As at December 2018 there were eight properties being marketed at the following asking prices:
- 3-bed terraced: £198,500-£203,000 or £238-£243/ft<sup>2</sup>
  - 3-bed detached: £210,000-£220,995 or £232-£244/ft<sup>2</sup>
  - 4-bed detached: £296,500 or £225/ft<sup>2</sup>
- 3.15 The full information on marketed homes is displayed within Table 3.1: below.
- 3.16 A 5% indicative discount has also been applied in analysis to illustrate anticipated incentives provided via negotiation upon sale. This is in line with market expectations.

**Table 3.1: Hatters Park, Laurus Homes: Availability and Pricing Analysis (December 2018)**

House Type	Accommodation Type	No. of Units	Average Size (ft <sup>2</sup> )	Average Asking Price	£ / ft <sup>2</sup>	Asking Price at 5% Discount	£ /ft <sup>2</sup> at 5% Discount
The Elphin	Terraced	3	834	£201,500	£242	£191,425	£229
<b>Terraced Summary:</b>		<b>3</b>	<b>834</b>	<b>£201,500</b>	<b>£242</b>	<b>£191,425</b>	<b>£229</b>
The Lidell	Detached	4	859	£212,749	£248	£202,111	£235
The Richmond	Detached	1	1,253	£296,500	£237	£281,675	£225
<b>Detached Summary:</b>		<b>5</b>	<b>938</b>	<b>£229,499</b>	<b>£245</b>	<b>£218,024</b>	<b>£232</b>
<b>Scheme Summary:</b>		<b>8</b>	<b>899</b>	<b>£218,999</b>	<b>£244</b>	<b>£208,049</b>	<b>£231</b>

Source: Laurus Homes

### Achieved Sales

- 3.17 No achieved sales have been recorded by Land Registry at the time of publication.

### ***Comparison to Subject Site***

- 3.18 This Laurus Homes development is small in comparison to the proposed development at the subject site, and achieves an average density of 34 dwellings per hectare (dph). It contains a mix of house types with asking prices at a more appropriate level (/ft<sup>2</sup>) for comparison purposes.
- 3.19 Considering the size and density of this development; the surrounding characteristics; and its location in the suburbs (of Runcorn as opposed to Warrington), it is considered that this scheme will represent a medium-high degree of pricing comparability with the proposed development of the subject site, though pitched marginally lower than what we expect of housing on the subject site.

### ***The Meadows, Morris Homes***

- 3.20 Morris Homes is currently marketing and constructing the Wharford Lane phase of The Meadows; a development of 219 dwellings located on a greenfield site to the east of Runcorn, between the housing estate of Windmill Hill (on the west) and the village of Keckwick. The site is located circa 2.5 miles from the subject site. The development comprises a mix of 2, 3 and 4-bed, terraced, semi-detached and detached properties, and includes some apartments.
- 3.21 The site measures an area of 9.04 ha and comprises a portion of the Sandymoor neighbourhood (Sandymoor North Phase 1). It is bound to the north by the Daresbury Expressway (A558) which provides access west to Runcorn and east to the A56 (Warrington and M6). The West Coast Main Line (WCML) and the Manchester-Chester railways lines lie immediately to the east whilst the Bridgewater Canal runs along the southern and western edges of the site.
- 3.22 The planning application (ref: 14/000161/FUL) was granted in July 2014 and the site remains under construction and is being marketed by Morris Homes.

### ***Availability and Asking Price***

- 3.23 As at December 2018 there were eight properties being marketed with asking prices summarised as follows:
- 4-bed detached: £306,750-£406,750 or £226-£237/ft<sup>2</sup>
- 3.24 The full information on marketed homes is detailed in Table 3.2:.
- 3.25 A 5% indicative discount has also been applied in analysis to illustrate anticipated incentives provided via negotiation upon sale. This is in line with market expectations.

**Table 3.2: The Meadows, Morris Homes, Availability & Pricing Analysis (December 2018)**

Plot No.	House Type	Accomm. Type	Size (ft <sup>2</sup> )	Asking Price	£ /ft <sup>2</sup>	Asking Price at 5% Discount	£ / ft <sup>2</sup> at 5% Discount
161	Staunton	Detached	1,318	£307,750	£233	£292,363	£222
128	Staunton	Detached	1,318	£306,750	£233	£291,413	£221
140	Moreton 2	Detached	1,326	£309,750	£234	£294,263	£222
139	Winster	Detached	1,796	£406,750	£226	£386,413	£215
170	Wharfdale Plus	Detached	1,423	£321,750	£226	£305,663	£215
164	Wharfdale Plus	Detached	1,423	£321,750	£226	£305,663	£215
165	Willington	Detached	1,462	£346,750	£237	£329,413	£225
159	Bramhall Plus	Detached	1,353	£317,750	£235	£301,863	£223
<b>Scheme Summary:</b>			<b>1,427</b>	<b>£329,875</b>	<b>£231</b>	<b>£313,381</b>	<b>£220</b>

*Source: Morris Homes*

***Achieved Sales***

- 3.26 Evidence of achieved sales was obtained via Land Registry, which contains records of 23 sales of terraced, semi-detached and detached units between December 2017 and September 2018. The total achieved values range from £192,750 - £325,750.
- 3.27 Terraced units achieved an average of £192/ft<sup>2</sup>; semi-detached units achieved an average of £222/ft<sup>2</sup>; and detached units achieved an average of £229/ft<sup>2</sup>. The current overall achieved sales average equates to £217/ft<sup>2</sup>. This is summarised in Table 3.3: overleaf.

**Table 3.3: The Meadows, Morris Homes: Achieved Sales** (No. of Beds have been estimated)

Date From:	Date To:	Address	Accommodation Type	No. Beds	No. Sales	Average Size (ft <sup>2</sup> )	Total Size (ft <sup>2</sup> )	Total Revenue	Average Sold Price	£ /ft <sup>2</sup>
15/12/2017	09/02/2018	Actons Wood Lane	Terraced	3	7	1,106	7,739	£1,489,250	£212,750	£192
<b>3-bed Terraced Summary:</b>				<b>3</b>	<b>7</b>	<b>1,106</b>	<b>7,739</b>	<b>£1,489,250</b>	<b>£212,750</b>	<b>£192</b>
16/02/2018	03/08/2018	Actons Wood Lane	Semi-detached	3	3	901	2,702	£602,250	£200,750	£223
23/02/2018	23/02/2018	Magna Park	Semi-detached	3	1	958	958	£210,750	£210,750	£220
<b>3-bed Semi-detached Summary:</b>				<b>3</b>	<b>4</b>	<b>915</b>	<b>3,660</b>	<b>£813,000</b>	<b>£203,250</b>	<b>£222</b>
03/08/2018	03/08/2018	Actons Wood Lane		3	1	1,001	1,001	£228,750	£228,750	£229
<b>3-bed Detached Summary:</b>				<b>3</b>	<b>1</b>	<b>1,001</b>	<b>1,001</b>	<b>£228,750</b>	<b>£228,750</b>	<b>£229</b>
09/02/2018	03/08/2018	Actons Wood Lane	Detached	4	5	1,150	5,748	£1,348,350	£269,670	£235
01/12/2017	28/09/2018	Magna Park	Detached	4	6	1,374	8,245	£1,850,900	£308,483	£224
<b>4-bed Detached Summary:</b>				<b>4</b>	<b>11</b>	<b>1,272</b>	<b>13,993</b>	<b>£3,199,250</b>	<b>£290,841</b>	<b>£229</b>
<b>Scheme Summary:</b>					<b>23</b>	<b>1,148</b>	<b>26,393</b>	<b>£5,730,250</b>	<b>£249,141</b>	<b>£217</b>

Source: Land Registry



### ***Comparison to Subject Site***

- 3.28 The Meadows is part of an allocated housing site within the Council's adopted Core Strategy (2013), and is just one phase of development of the Sandymoor Neighbourhood Masterplan (potentially up to 2,000 dwellings).
- 3.29 The development is being marketed based on its semi-rural, Cheshire setting, including its proximity and accessibility to the countryside and woodlands. Furthermore, and corresponding to the subject site, this development site has the benefit of being well connected, via the M56/ A56 and A558 road networks, which directly link to Runcorn, Warrington, Chester and Manchester, as well as the M6 corridor. The nearest train station is approximately 1.0 mile to the south with services to Chester and Manchester Piccadilly.
- 3.30 Based upon the above and noting that this development is located further away from Walton/closer to Runcorn, it is expected that The Meadows will achieve lower values, circa 10-15% in price under the subject site.

### ***Sandymoor Neighbourhood***

- 3.31 Several phases of the Sandymoor Neighbourhood Masterplan towards the south and west have already completed on-site, the most recent being the Sandymoor South Phase 1 by David Wilson Homes. Planning permission (ref: 14/00575/FUL) was granted in March 2015 and their 7.90 ha site delivered 106 dwellings, comprising a mix of 3, 4 and 5-bed, terraced, semi-detached and detached properties.

### ***Achieved Sales***

- 3.32 Evidence of achieved sales was obtained via Land Registry, which contains records of 48 sales of terraced, semi-detached and detached units between December 2017 and November 2018. The total achieved sales values range from £149,995 - £419,995.
- 3.33 Terraced units achieved an average of £198/ft<sup>2</sup>; semi-detached units achieved an average of £213/ft<sup>2</sup>; and detached units achieved an average of £216/ft<sup>2</sup>. The overall achieved sales average equates to £214/ft<sup>2</sup>. This is summarised in Table 3.4: overleaf.

**Table 3.4: Sandymoor Neighbourhood: Achieved Sales (No. of Beds have been estimated)**

Date From:	Date To:	Address	Accommodation Type	No. Beds	No. Sales	Average Size (ft <sup>2</sup> )	Total Size (ft <sup>2</sup> )	Total Revenue	Average Sold Price	£ /ft <sup>2</sup>
01/12/2017	23/03/2018	Wisbech Close	Terraced	3	9	836	7,524	£1,489,480	£165,498	£198
<b>3-bed Terraced Summary:</b>				<b>3</b>	<b>9</b>	<b>836</b>	<b>7,524</b>	<b>£1,489,480</b>	<b>£165,498</b>	<b>£198</b>
01/12/2017	02/02/2018	Wisbech Close	Semi-detached	3	5	833	4,166	£879,205	£175,841	£211
16/02/2018	16/02/2018	Bitteswell Court	Semi-detached	3	1	958	958	£211,750	£211,750	£221
<b>3-bed Semi-detached Summary:</b>				<b>3</b>	<b>6</b>	<b>854</b>	<b>5,124</b>	<b>£1,090,955</b>	<b>£181,826</b>	<b>£213</b>
08/12/2017	08/12/2017	Wisbech Close	Detached	3	1	850	850	£226,995	£226,995	£267
<b>3-bed Detached Summary:</b>				<b>3</b>	<b>1</b>	<b>850</b>	<b>850</b>	<b>£226,995</b>	<b>£226,995</b>	<b>£267</b>
15/06/2018	02/11/2018	Bitteswell Court	Detached	4	4	1,300	5,199	£1,193,200	£298,300	£230
26/01/2018	23/02/2018	Morston Road	Detached	4	4	1,711	6,846	£1,452,990	£363,248	£212
01/12/2017	29/06/2018	Walsingham Drive	Detached	4	23	1,596	36,705	£7,931,746	£344,859	£216
<b>4-bed Detached Summary:</b>				<b>4</b>	<b>31</b>	<b>1,573</b>	<b>48,750</b>	<b>£10,577,936</b>	<b>£341,224</b>	<b>£217</b>
20/08/2018	20/08/2018	Walsingham Drive	Detached	5	1	2,390	2,390	£419,995	£419,995	£176
<b>5-bed Detached Summary:</b>				<b>5</b>	<b>1</b>	<b>2,390</b>	<b>2,390</b>	<b>£419,995</b>	<b>£419,995</b>	<b>£176</b>
<b>Scheme Summary:</b>					<b>48</b>	<b>1,347</b>	<b>64,637</b>	<b>£13,805,361</b>	<b>£287,612</b>	<b>£214</b>

Source: Land Registry

### ***Comparison to Subject Site***

- 3.34 Similarly to The Meadows, data captured from this area forms part of an allocated housing site within the Council's adopted Core Strategy (2013) and the Sandymoor Neighbourhood Masterplan (potentially up to 2,000 dwellings).
- 3.35 This development site has the benefit of being well connected, via the M56/ A56 and A558 road networks, which directly link to Runcorn, Warrington, Chester and Manchester, as well as the M6 corridor. The nearest train station is approximately 1.0 mile to the south with services to Chester and Manchester Piccadilly.
- 3.36 Based upon the above and noting that this development is located further away from Walton/ closer to Runcorn, it is expected that the subject site will achieve higher sales values than recorded here, in the region of 10-15%% higher.

### ***Saviours Place and Kings Quarter, Barratt Homes***

- 3.37 Saviours Place and Kings Quarter are neighbouring developments totalling 180 dwellings and located on Stretton Road, Stretton. The developments comprise a mix of 2, 3 4 and 5-bed, terraced, semi-detached and detached properties.
- 3.38 The 7.47 hectare site is located approximately 2.0 miles to the south-east of the subject site and directly south of Appleton village. The area immediately to the south of the site is a primary school and Stretton Road, which leads to the village centre. The northern boundary of the site is characterised by existing new-build housing development.
- 3.39 The planning permission (ref: 18/32672) was granted in October 2018 and the site is currently being marketed by Barratt Homes as two developments.

### ***Availability and Asking Prices***

- 3.40 As at May 2019 there were nine properties being marketed across the two sites at the following asking prices:

#### **Saviours Place**

- 3-bed terraced (2.5 storey): £242,395 or £219/ft<sup>2</sup>
- 4-bed detached: £336,995 or £296/ft<sup>2</sup>

#### **Kings Quarter**

- 3-bed terraced (2.5 storey): £234,395-£238,395 or £212-£215/ft<sup>2</sup>
- 4-bed terraced: £309,995 or £266/ft<sup>2</sup>
- 4-bed detached: £335,950 or £294/ft<sup>2</sup>

- 3.41 The full information on marketed homes is displayed within Tables 3.7 and 3.8 below.
- 3.42 A 5% indicative discount has also been applied in analysis to illustrate anticipated incentives provided via negotiation upon sale. This is in line with market expectations.

**Table 3.5: Saviours Place, Barratt Homes: Availability and Pricing Analysis (May 2019)**

House Type	Accommodation Type	No. of Units	Average Size (ft <sup>2</sup> )	Average Asking Price	£ / ft <sup>2</sup>	Asking Price at 5% Discount	£ /ft <sup>2</sup> at 5% Discount
Norbury	Terraced (2.5 storey)	2	1,107	£242,395	£219	£230,275	£208
Kennford	Detached	1	1,139	£336,995	£296	£320,145	£281
<b>Scheme Summary:</b>		<b>3</b>	<b>1,118</b>	<b>£273,928</b>	<b>£245</b>	<b>£260,232</b>	<b>£233</b>

**Table 3.6: Kings Quarter, Barratt Homes: Availability and Pricing Analysis (May 2019)**

House Type	Accommodation Type	No. of Units	Average Size (ft <sup>2</sup> )	Average Asking Price	£ / ft <sup>2</sup>	Asking Price at 5% Discount	£ /ft <sup>2</sup> at 5% Discount
Norbury	Terraced (2.5 storey)	3	1,107	£235,728	£213	£223,942	£202
Hawley	Terraced	2	1,166	£309,995	£266	£294,495	£253
<b>Terraced Summary:</b>		<b>5</b>	<b>1,131</b>	<b>£265,435</b>	<b>£235</b>	<b>£252,163</b>	<b>£223</b>
Tewkesbury	Detached	1	1,141	£335,950	£294	£319,153	£280
<b>Detached Summary:</b>		<b>1</b>	<b>1,141</b>	<b>£335,950</b>	<b>£294</b>	<b>£319,153</b>	<b>£280</b>
<b>Scheme Summary:</b>		<b>6</b>	<b>1,132</b>	<b>£277,188</b>	<b>£245</b>	<b>£263,328</b>	<b>£233</b>

Source: Barratt Homes

**Achieved Sales**

3.43 No achieved sales have been recorded by Land Registry at the time of publication.

## 4. Conclusions

- 4.1 This report has been prepared by Turley Development Viability on behalf of the parties in order to provide an independent assessment of the residential market relevant to the promotion of land to the north of the A56 at Higher Walton, Warrington.
- 4.2 The report will be utilised as a guide for the assessment of market pricing for comparison with that proposed in Warrington Council's Local Plan viability evidence.
- 4.3 The report has been informed by a review of published market intelligence and local transactional evidence, as well as a wider market consultation exercise with developers currently marketing comparable schemes in the local area.
- 4.4 Although pricing recommendations contained herein are based upon local market data, there is potential for this development site [owing to its scale] to adopt its own price levels.
- 4.5 It is anticipated that actual achievable values will range from £220-280/ft<sup>2</sup> depending on unit type, with 2.5/3 storey terraced or semi-detached units generating the lowest values and smaller detached units achieving the highest values.
- 4.6 Based on the market evidence contained within this report, an average open market sales value equating to £250-260/ft<sup>2</sup> is determined as appropriate for adoption across the range of unit types anticipated to be delivered upon the subject site. This value falls below some of the values identified as achieved in Walton, but we regard the SWUE site as somewhat separate from the Walton/Stockton Heath environs and values will reduce, and the wider new build comparables are regarded as highly pertinent.
- 4.7 The upper end of the anticipated average value range (£260/ft<sup>2</sup>) has been adopted within the high level viability appraisals of the scheme that are included in the representation provided on behalf of our clients in respect of the Council's Local Plan Viability Assessment.

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## **Appendix 2: Rider Levett Bucknall Cost Report**

REPORT

1 MARCH 2019

## COST REPORT NUMBER ONE, REV C

SW WARRINGTON URBAN EXTENSION

PEEL INVESTMENT (NORTH), STORY HOMES & ASHALL HOMES

### Prepared By

Paul Beeston  
Partner

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# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## AUTHORISATION

This report has been prepared by:

Signature.....  
Liam Bickley

and authorised for issue by:

Signature.....  
Paul Beeston FRICS

## 1. EXECUTIVE SUMMARY

### 1.1 Status of Costs

This report is based on the emerging masterplan for the South West Urban Extension of Warrington. It includes strategic infrastructure. The primary purpose of the report is draw together information that has been prepared to date for the scheme. The design of the project is generally reflective of preliminary work prior to an Outline Planning Application, and as such carries a relatively high level of risk.

### 1.2 Cost Summary

By cost heading	Cost £	£ / SF	£ / Unit	£ / Acre
Section 106 Contributions	0	0.00	0	0
Strategic Off Site Works	9,719,616	0.00	5,254	79,931
Strategic On Site Works	25,186,073	0.00	13,614	207,122
<b>TOTAL</b>	<b>34,905,689</b>	<b>0.00</b>	<b>18,868</b>	<b>287,052</b>

## 2 PROJECT INFORMATION

### 2.1 Project Team

Client	Peel Investment (North), Story Homes & Ashall Homes
Masterplanner	Randall Thorpe
Quantity Surveyor	Rider Levett Bucknall
Utilities Assessment	TDS
Planning Consultant	Turley
Viability	Turley

### 2.2 Background

This report has been prepared based on early design information being prepared to progress the masterplanning of the site prior to the site being adopted in the Local Plan.

### 2.3 Description of the Works

Strategic Land site including infrastructure.

## 3 BASIS OF REPORT

### 3.1 Purpose and Status of Report

This report has been prepared to provide a preliminary cost estimate for the project.

### 3.2 Basis of Procurement

The costs assume that competitive tenders are obtained for the works.

### 3.3 Programme

All costs are reported on a current day basis (1Q19) with no provision for inflation.

### 3.4 Information Used

#### 3.4.1 *Generally*

Drawings as listed in the cost plan

Randall Thorp Drawing 630DE-13I

Itransport Drawing ITM 132243 - GA - 003 (For information only, does not show exact junction deta

Itransport Drawing ITM 132243 - GA - 002

Croft Drawing 2404 - F01

### 3.5 Specifications

Specifications are to be to be an adoptable standard for infrastructure.

## 3.6 Exclusions

### 3.6.1 *Generic Exclusions*

- Local taxes (eg. VAT)
- Land acquisition cost / Land compensation costs
- Land rental for temporary accommodation
- Restrictive Land Covenants / Ransoms / Rights of Light / Land compensation / Oversailing
- Finance
- Legal Fees
- Agency Fees
- Statutory Approval Fees (Planning etc)
- Inflation / Increase costs
- Flood defence works
- Acoustic Fences
- Archaeological watching briefs
- Marketing signage
- Off services reinforcement
- Section 106 costs
- CIL
- Landscaping maintenance / commuted sums
- Land acquisition, including for off site highway schemes
- Diverting Gas Main or grounding cables, unless noted otherwise
- On plot works, including estate roads, dwellings and abnormal foundations

## 3.7 Projected Increase in Costs

Base costs are reported on a current day basis.

## 3.8 Assumptions

Much of the report has been based on assumption at this stage. It is assumed there are a total of 1,850 units.

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019

## 3.9 Reconciliation with WBC Costs (£ millions)

\* Like for like with WBC scope for construction elements only

REF	DESCRIPTION	WBC ESTIMATE							DEVELOPER (RLB ESTIMATE)+J36	DIFFERENCE
		[a]	[b]	[c]	[d]	[e]	[f]	[g] = Sum [a] to [f]		
		Design	Construction	Inflation	WBC	Land	Risk	Total	Construction *	Construction *
	<b>Highways</b>									
H1	Internal spine road	0.654	7.411	0.000	0.000	0.563	0.296	8.924	4.445	-2.966
H2	Runcorn Road	0.151	1.994	0.000	0.349	0.693	0.069	3.256	1.429	-0.565
H3	Mill Lane	0.121	1.516	0.000	0.280	0.234	0.055	2.206	inc in H1	-1.516
	<b>Sub-total</b>	<b>0.926</b>	<b>10.921</b>	<b>0.000</b>	<b>0.629</b>	<b>1.490</b>	<b>0.420</b>	<b>14.386</b>	<b>5.874</b>	<b>-5.046</b>
	<b>Junctions</b>									
J1	Chester Road site access	0.303	2.580	0.000	0.701	0.166	0.088	3.839	1.100	-1.480
J2	Chester Road/Runcorn Road junction	0.359	2.310	0.000	0.829	0.143	0.075	3.715	1.200	-1.110
J3	Runcorn Road site access 1	0.193	1.819	0.000	0.446	0.119	0.063	2.640	1.000	-0.819
J4	Runcorn Road site access 2	0.193	1.819	0.000	0.446	0.119	0.063	2.640	0.850	-0.969
J5	Runcorn Road site access 3	0.193	1.819	0.000	0.446	0.119	0.063	2.640	0.850	-0.969
	<b>Sub-total</b>	<b>1.242</b>	<b>10.349</b>	<b>0.000</b>	<b>2.868</b>	<b>0.665</b>	<b>0.350</b>	<b>15.473</b>	<b>5.000</b>	<b>-5.349</b>
	<b>Bus services</b>									
B1	Bus gate on Internal Spine Road	0.019	0.229	0.000	0.045	0.009	0.009	0.311	0.220	-0.009
B2	New bus services	0.000	0.000	0.000	0.000	0.000	0.000	0.000	EXCL	
	<b>Sub-total</b>	<b>0.019</b>	<b>0.229</b>	<b>0.000</b>	<b>0.045</b>	<b>0.009</b>	<b>0.009</b>	<b>0.311</b>	<b>0.220</b>	<b>-0.009</b>
	<b>Strategic Cycle routes</b>									
SC1	Internal greenway connections	0.072	0.788	0.000	0.167	0.062	0.033	1.123	1.239	0.451
SC2	Greenway route	0.150	1.628	0.000	0.346	0.129	0.068	2.320	in SC1	
SC3	Upgrade of Bridgwater canal towpath to south of site	0.102	1.112	0.000	0.236	0.088	0.046	1.585	0.263	-0.849
	<b>Sub-total</b>	<b>0.324</b>	<b>3.528</b>	<b>0.000</b>	<b>0.749</b>	<b>0.279</b>	<b>0.147</b>	<b>5.028</b>	<b>1.501</b>	<b>-0.399</b>
	<b>Community</b>									
PS	Primary school	0.000	0.000	0.000	0.000	0.000	0.000	0.000	EXCL	
DC	District centre/community hub	0.000	0.000	0.000	0.000	0.000	0.000	0.000	EXCL	
OS	Open space	0.000	0.000	0.000	0.000	0.000	0.000	0.000	EXCL	
	<b>Sub-total</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>
	<b>TOTAL</b>	<b>2.511</b>	<b>25.026</b>	<b>0.000</b>	<b>4.291</b>	<b>2.444</b>	<b>0.925</b>	<b>35.198</b>	<b>12.595</b>	<b>-10.803</b>
	% on Cost	10.0%		0.0%	17.1%	8.3%	2.9%			
	Per Unit Cost	1,358	13,528	0	2,320	1,321	500	19,026	6,808	-6,520
	Per Gross Acre Cost	9,259	92,264	0	15,820	9,010	3,411	129,764	46,434	-39,828
	Red items in WBC schedule "Optional Scope" & excluded		<b>6.608</b>					<b>9.496</b>	<b>2.183</b>	<b>-4.426</b>
	WBC cost as presented		<b>18.418</b>					<b>25.702</b>	<b>10.413</b>	<b>-8.006</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019

## 4 AREAS

PLOT	PLOT AREA		UNITS	DENSITY		AV UNIT	GIA	
	(acres)	(Ha)	Nr	DPA	DPH	SF/Unit	(SF)	(m2)
<b>DEVELOPMENT CELLS</b>								
<b>RESIDENTIAL</b>								
Outer zone	32.9	13.30	466	14.2	35.0		0	0
Middle zone	3.3	1.33	47	14.2	35.0		0	0
Balance of main site	65.5	26.51	928	14.2	35.0		0	0
South of Chester Rd	15.2	6.17	217	14.2	35.2			
<b>Sub total</b>	<b>116.9</b>	<b>47.3</b>	<b>1,657</b>	<b>14.2</b>	<b>35.0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>OTHER</b>								
Education	3.5	1.40	0	0.0	0.0		0	0
Local centre	1.2	0.50	193	156.2	386.0		0	0
<b>Sub total</b>	<b>4.7</b>	<b>1.90</b>	<b>193</b>	<b>41.1</b>	<b>101.6</b>		<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>121.60</b>	<b>49.21</b>	<b>1,850</b>	<b>15.2</b>	<b>37.6</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>GREEN INFRASTRUCTURE</b>								
<b>FORMAL OPEN SPACES</b>								
Amenity open	4.6	1.88						
Allotments	4.4	1.77						
Play areas	0.2	0.10						
<b>INFORMAL OPEN SPACES</b>								
Existing woodland	22.0	8.90						
Proposed woodland	18.3	7.40						
Existing public right of way	0.2	0.10						
Proposed pedestrian routes	3.0	1.20						
Proposed cycle routes	1.0	0.40						
Natural & semi natural greenscape	66.0	26.69						
<b>TOTAL</b>	<b>119.7</b>	<b>48.44</b>						
<b>OTHER AREAS</b>								
Primary vehicular distribution	16.4	6.65						
Existing properties	13.5	5.47						
<b>TOTAL</b>	<b>29.9</b>	<b>12.12</b>						
<b>GRAND TOTAL</b>	<b>271.25</b>	<b>109.77</b>						

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019

## 5. COST SUMMARY

## Total Cost

REF	DESCRIPTION	TOTAL COST £	COST / SF 0 SF	COST / Unit 1,850 units	COST / Acre 122 acres
<b>A</b>	<b>SECTION 106 OBLIGATIONS</b>				
	1 SECTION 106 PAYMENTS	0		0	0
	2 CIL	0		0	0
	<b>Sub-total S106</b>	<b>0</b>		<b>0</b>	<b>0</b>
<b>B</b>	<b>STRATEGIC OFF SITE WORKS</b>				
	1 ACCESS JUNCTIONS	5,675,670		3,068	46,675
	2 OFF SITE JUNCTIONS	4,043,946		2,186	33,256
	<b>Total</b>	<b>9,719,616</b>		<b>5,254</b>	<b>79,931</b>
<b>C</b>	<b>STRATEGIC ON SITE WORKS</b>				
	1 PRIMARY DISTRIBUTION ROADS	5,663,275		3,061	46,573
	2 STRATEGIC LANDSCAPING	4,864,224		2,629	40,002
	3 SERVICES	13,327,180		7,204	109,598
	4 ENVIRONMENTAL WORKS	1,174,520		635	9,659
	5 TEMPORARY WORKS	156,875		85	1,290
	<b>Total</b>	<b>25,186,073</b>		<b>13,614</b>	<b>207,122</b>
	<b>Sub-total infrastructure</b>	<b>34,905,689</b>		<b>18,868</b>	<b>287,052</b>
	<b>TOTAL</b>	<b>34,905,689</b>		<b>18,868</b>	<b>287,052</b>



# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019

## A Section 106 Obligations

£0

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>1</b>	<b>SECTION 106 PAYMENTS</b>			
1.01	Education			EXCLUDED
1.02	Travel Plan Monitoring			EXCLUDED
1.03	Recreation			EXCLUDED
1.04	Public Transport			EXCLUDED
1.05	Off site highways a Included elsewhere			EXCLUDED
	<b>SECTION 106 PAYMENTS Total</b>			<b>0</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019

## A Section 106 Obligations

£0

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>2</b>	<b>CIL</b>			
<b>2.01</b>	<b>Contributions</b>			
	a Excluded			EXCLUDED
	<b>Sub-total</b>			<b>0</b>
	<b>CIL Total</b>			<b>0</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## B Strategic Off Site Works

£9,719,616

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>1</b>	<b>ENTRANCE JUNCTIONS</b>			
<b>1.01</b>	<b>J5: Runcorn Road, West</b>			
	a New Junction; assumed staggered T junction or cross roads; un-signalled	1 item	850,000.00	850,000
<b>1.02</b>	<b>J4: Runcorn Road, Central</b>			
	a New Junction; assumed staggered T junction or cross roads; un-signalled	1 item	850,000.00	850,000
<b>1.03</b>	<b>J3: Runcorn Road, East</b>			
	a New Junction; assumed Roundabout	1 item	1,000,000.00	1,000,000
<b>1.04</b>	<b>J1: A56 North Plot Access</b>			
	a New Junction; new traffic signals and modification to existing Mill Lane	1 item	1,100,000.00	1,100,000
<b>1.05</b>	<b>J0: A56 South Plot Access</b>			
	a New Junction (Non RB solution - right turn through central reservation)	1 item	750,000.00	750,000
<b>1.06</b>	<b>On Costs</b>			
	a <i>Stage 3 safety audits</i>			incl
	b <i>Traffic Management</i>			incl
	c <i>Preliminaries</i>			incl
	d <i>Section 278 Inspection Fees</i>	8 %	4,550,000.00	364,000
	e <i>Bonding Costs</i>			excl
	f <i>Professional Fees</i>	10 %	4,914,000.00	491,400
	g <i>Contingency</i>	5 %	5,405,400.00	270,270
	<b>ENTRANCE JUNCTIONS Total</b>			<b>5,675,670</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## B Strategic Off Site Works

£9,719,616

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>2</b>	<b>OFF SITE WORKS</b>			
<b>2.01</b>	<b>Improvements to Runcorn Road</b>			
	a Improvements to Runcorn Road including minor realignment (scope undefined)	1,021 m	1,400.00	1,429,400
<b>2.02</b>	<b>J2: A56 / Runcorn Road Junction</b>			
	a Allowance for improvements to existing signalised junction; scope unknown	1 item	1,200,000.00	1,200,000
<b>2.03</b>	<b>A56 / Mill Lane Junction</b>			
	a Downgrade / modify existing Mill Lane junction; scope unknown (extra over J1)	1 item	100,000.00	100,000
<b>2.04</b>	<b>Mill Lane Modifications / Stopping up?</b>			
	a General allowance for length of Mill Lane	1 ProvSum	250,000.00	250,000
<b>2.05</b>	<b>Works to Bridgewater Canal</b>			
	a Provisional Allowance for undefined improvements	1,750 m	150.00	262,500
<b>2.06</b>	<b>On Costs</b>			
	a <i>Stage 3 safety audits</i>			incl
	b <i>Traffic Management</i>			incl
	c <i>Preliminaries</i>			incl
	d <i>Section 278 Inspection Fees</i>	8 %	3,241,900.00	259,352
	e <i>Bonding Costs</i>			excl
	f <i>Professional Fees</i>	10 %	3,501,252.00	350,125
	g <i>Contingency</i>	5 %	3,851,377.20	192,569
	<b>Sub-total</b>	33%		<b>1,064,546</b>
	<b>OFF SITE WORKS Total</b>			<b>4,043,946</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>1</b>	<b>PRIMARY DISTRIBUTION ROADS</b>			
<b>1.01</b>	<b>Roads and Footpaths</b>			
	<b>New distribution roads</b>			
a	Vehicular road: primary	1,530 m	1,350.00	2,065,500
	<b>Extra over</b>			
a	Junctions: primary/primary only	9 Nr	15,000.00	135,000
b	Levels issues; localised raising levels (SAY)	5 Nr	20,000.00	100,000
c	Homezones/feature areas (SAY)	4 Nr	15,000.00	60,000
d	Structures: existing watercourses	1 Nr	250,000.00	250,000
e	Bus stops/shelters (SAY)	4 Nr	35,000.00	140,000
	<b>Roads and Footpaths Total</b>			<b>2,750,500</b>
<b>1.02</b>	<b>Drainage</b>			
a	Highway drainage	1,530 m	30.00	45,900
b	FW runs	1,530 m	175.00	267,750
c	SW runs	1,530 m	300.00	459,000
	<b>Drainage Total</b>			<b>772,650</b>
<b>1.03</b>	<b>Landscaping</b>			
a	Highway landscaping	1,530 m	25.00	38,250
	<b>Landscaping Total</b>			<b>38,250</b>
<b>1.04</b>	<b>Services</b>			
a	Streetlighting	102 Nr	2,200.00	224,400
b	Lit bollards	31 Nr	450.00	13,950
	<b>Services Total</b>			<b>238,350</b>
<b>1.05</b>	<b>Sundries</b>			
a	Signage	31 Nr	1,000.00	31,000
b	Signage modifications (road names/directional etc)	1 item	10,000.00	10,000
c	Bus Gates; scope unknown (SAY)	2 Nr	100,000.00	200,000
	<b>Sundries Total</b>			<b>241,000</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>1.06</b>	<b>Preliminaries</b>			
	a Site establishment, supervision and management	10 %	4,040,750.00	404,075
	<b>Preliminaries Total</b>			<b>404,075</b>
<b>1.07</b>	<b>Contingency and Risk</b>			
	a Design and Price Risk	2 %	4,444,825	88,897
	b Construction Contingency	3 %	4,444,825	133,345
	c Specific Provisions: Adoption remedial work	1 item	100,000.00	100,000
	<b>Contingency and Risk Total</b>			<b>322,241</b>
<b>1.08</b>	<b>Fees and other charges</b>			
	<b>Delivery Fees</b>			
	a Professional fees on delivery	10 %	4,767,066.25	476,707
	<b>Consents and fees</b>			
	b Local Authority	8 %	5,243,772.88	419,502
	<b>Fees and other charges Total</b>			<b>896,208</b>
	<b>PRIMARY DISTRIBUTION ROADS Total</b>			<b>5,663,275</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>2</b>	<b>STRATEGIC LANDSCAPING</b>			
<b>2.01</b>	<b>Strategic open space</b>			
	<i>Allotments</i>			
a	Allotment Spaces	17,400 m2	15.00	261,000
b	Fencing	800 m	150.00	120,000
c	Car park: 30 m2 per space; full road construction	10 Nr	3,000.00	30,000
d	Signage / Power / Water	1 item	40,000.00	40,000
	<i>Open spaces</i>			
e	Formal park areas	18,800 m2	30.00	564,000
f	NEAP	1 Nr	250,000.00	250,000
g	Sundries to formal park areas	1 item	100,000.00	100,000
h	Landscaping allowance to existing woodland	89,000 m2	2.00	178,000
j	Proposed woodland planting	74,000 m2	5.00	370,000
k	Landscaping allowance to natural and semi-natural greenscape	266,900 m2	2.00	533,800
	<b>Strategic open space Total</b>			<b>2,446,800</b>
<b>2.02</b>	<b>Recreational Routes</b>			
d	Pedestrian footpath: works to existing route	420 m	50.00	21,000
a	Pedestrian footpath: new; 2m wide	5,800 m	100.00	580,000
c	Cycle route: 3m wide	1,350 m	150.00	202,500
e	Off site Strategic Route Connections	6 Nr	10,000.00	60,000
f	Extra over for bridges / structures	5 Nr	75,000.00	375,000
	<b>Recreational Routes Total</b>			<b>1,238,500</b>
<b>2.03</b>	<b>Sundries</b>			
a	Signage/street furniture/sundries	1 item	100,000.00	100,000
	<b>Sundries Total</b>			<b>100,000</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>2.04</b>	<b>Preliminaries</b>			
	a Site establishment, supervision and management	10 %	3,785,300.00	378,530
	c Road closure notices, adverts and approvals	0 item	excluded	excluded
	<b>Preliminaries Total</b>			<b>378,530.00</b>
<b>2.05</b>	<b>Contingency and Risk</b>			
	a Design and Price Risk	2 %	4,163,830.00	83,277
	b Construction Contingency	3 %	4,163,830.00	124,915
	c Specific Provisions: Adoption remedial works	1 item	50,000.00	50,000
	<b>Contingency and Risk Total</b>			<b>258,192</b>
<b>2.06</b>	<b>Fees and other charges</b>			
	a Professional Fees	10 %	4,422,021.50	442,202
	<b>Fees and other charges Total</b>			<b>442,202</b>
	<b>STRATEGIC LANDSCAPING Total</b>			<b>4,864,224</b>



# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>3</b>	<b>SERVICES</b>			
<b>3.01</b>	<b>Off site diversions</b>			
	a J1 - LV Pole	1 item	15,000.00	15,000
	b J2 - None expected	1 item	<b>EXCL</b>	<b>EXCL</b>
	c J3 - Diversion of Overhead BT	1 item	15,000.00	15,000
	d J4 - None expected	1 item	<b>EXCL</b>	<b>EXCL</b>
	e J5 - None expected	1 item	<b>EXCL</b>	<b>EXCL</b>
	f J6 - Diversion of underground BT	1 item	15,000.00	15,000
	g J7 - Diversion of underground LV	1 item	15,000.00	15,000
	h J7 - Diversion of underground BT	1 item	150,000.00	150,000
	j J7 - Diversion of underground Virgin	1 item	150,000.00	150,000
	<b>On site diversions Total</b>			<b>802,202</b>
<b>3.02</b>	<b>On site diversions</b>			
	a Diversion of HV infrastructure including replacing pole mounted transformers	1 item	750,000.00	750,000
	b Diversion of Overhead BT lines to SW corner of site	1 item	100,000.00	100,000
	<b>On site diversions Total</b>			<b>1,210,000</b>
<b>3.02</b>	<b>Off Site Reinforcement</b>			
	<b>Electrical</b>			
	a Cable lay off site	3,000 m	200.00	600,000
	b Primary Substation	1 Item	3,000,000.00	3,000,000
	<b>Gas</b>			
	a Medium pressure off site main to POC	1,250 m	200.00	250,000
	b Pressure Reduction System	1 Item	35,000.00	35,000
	<b>Water</b>			
	a Off site pipe lay to POC	1,000 m	200.00	200,000
	<b>Off site reinforcement Total</b>			<b>3,885,000</b>
<b>3.03</b>	<b>On site infrastructure</b>			
	a Electrical infrastructure; substations	8 Nr	60,000.00	480,000
	b Electrical, Gas and Water Connections	1,850 Nr	1,750.00	3,237,500
	<b>On Site Infrastructure Total</b>			<b>3,717,500</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>3.04</b>	<b>Protection of existing utilities on site</b>			
	<b>General Allowances</b>			
a	Provisional Sum	1 Prov	150,000	150,000
	<b>Protection Total</b>			<b>150,000</b>
<b>3.05</b>	<b>Storm water</b>			
	<b>Drainage</b>			
a	Conveyance in landscaped areas (SAY)	300 m	175.00	52,500
b	Manholes (assumed number)	10 Nr	2,500.00	25,000
	<b>SUDS</b>			
c	Assumed number and size of ponds (SAY)	4 Nr	175,000.00	700,000
n	Swale courses (SAY)	1,000 m	80.00	80,000
q	Dredge existing ditch courses (SAY)	150 m	20.00	3,000
r	New offsite connection (SAY)	1 Item	30,000.00	30,000
s	Headwalls	10 Nr	12,000.00	120,000
t	Headwalls; extra over for flow control	5 Nr	6,000.00	30,000
	<b>Storm water Total</b>			<b>1,040,500</b>
<b>3.06</b>	<b>Foul Water</b>			
	<b>Drainage</b>			
	<i>Foul strategy not clear</i>			
a	Provisional allowance for sewers in landscaped areas	300 m	175.00	52,500
b	Manholes	10 Nr	2,500.00	25,000
c	Pumping Stations	1 Nr	115,000.00	115,000
d	Off site works	1 Prov	200,000.00	200,000
	<b>Foul Water Total</b>			<b>392,500</b>
<b>3.07</b>	<b>Drainage diversions</b>			
	<b>Provisional allowances</b>			
a	Foul	1 item	30,000.00	30,000
b	Surface Water	1 item	30,000.00	30,000
	<b>Drainage diversions Total</b>			<b>60,000</b>
<b>3.08</b>	<b>Sundries</b>			
a	BT ducts / Virgin Media	1 item	150,000.00	150,000
	<b>Sundries Total</b>			<b>150,000</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>3.09</b>	<b>Preliminaries</b>			
	a Site establishment, supervision and management	10 %	10,805,500.00	1,080,550
	b Traffic Management; notices, adverts etc	1 item	12,000.00	12,000
	<b>Preliminaries Total</b>			<b>1,092,550</b>
<b>3.10</b>	<b>Contingency and Risk</b>			
	a Design and Price Risk	2 %	11,898,050.00	237,961
	b Construction Contingency	3 %	11,898,050.00	356,942
	c Specific risk provisions:			0
	<b>Contingency and Risk Total</b>			<b>594,903</b>
<b>3.11</b>	<b>Fees and other charges</b>			
	a Fees - services consultancy (gas, water, electricity)	3 %	12,492,952.50	374,789
	b Fees - delivery of services (gas, water, electricity and drainage)	3 %	12,492,952.50	374,789
	c Section 104 costs (inspection fees)	5 %	1,493,000.00	74,650
	d Section 104 costs (adoption legal fees)	1 item	10,000.00	10,000
	<b>Fees and other charges Total</b>			<b>834,227</b>
	<b>SERVICES Total</b>			<b>13,327,180</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>4</b>	<b>ENVIRONMENTAL WORKS</b>			
<b>4.01</b>	<b>Ecological works</b>			
	<i>Ecology Mitigation</i>			
a	Bird and Bat boxes	50 Nr	80.00	4,000
b	GCN / Other protected species allowance	1 item	200,000.00	200,000
c	Fencing (SAY)	500 m	40.00	20,000
e	Ecology Surveys etc (for construction)	1 item	75,000.00	75,000
f	Arbocultural Surveys	1 item	50,000.00	50,000
	<i>Invasive Species</i>			
a	Japanese Knotweed	1 item	25,000.00	25,000
b	Himalayan Balsam	1 item	25,000.00	25,000
	<b>Ecological works Total</b>			<b>399,000</b>
<b>4.02</b>	<b>Enabling Works</b>			
	<i>Ground improvement</i>			
a	Isolated hot spots of contamination (provisional)	1 item	30,000.00	30,000
b	Isolated ground improvement to road and infrastructure areas	1 item	50,000.00	50,000
	<i>Earthworks</i>			
c	Local plot adjustment / cut & fill	1 item	250,000.00	250,000
d	Top soil and subsoil handling strategy / levels issues	1 item	150,000.00	150,000
	<b>Enabling Works Total</b>			<b>480,000</b>
<b>4.03</b>	<b>Preliminaries</b>			
a	Site establishment, supervision and management on capital works	10 %	879,000.00	87,900
b	Traffic Management; notices, adverts etc	1 item	50,000.00	50,000
	<b>Preliminaries Total</b>			<b>137,900</b>
<b>4.04</b>	<b>Contingency and Risk</b>			
a	Design and Price Risk	2 %	1,016,900.00	20,338
b	Construction Contingency	3 %	1,016,900.00	30,507
c	Specific risk provisions:			0
	<b>Contingency and Risk Total</b>			<b>50,845</b>
<b>4.05</b>	<b>Fees and other charges</b>			
a	Fees - design and delivery fees on capital works	10 %	1,067,745.00	106,775
	<b>Fees and other charges Total</b>			<b>106,775</b>
	<b>ENVIRONMENTAL WORKS Total</b>			<b>1,174,520</b>

# SW WARRINGTON URBAN EXTENSION

COST REPORT NUMBER ONE, REV C - 1 MARCH 2019



## C Strategic On Site Works

£25,186,073

REF	DESCRIPTION	QTY UNIT	RATE	TOTAL
<b>5</b>	<b>TEMPORARY WORKS</b>			
<b>5.01</b>	<b>Temporary Works</b>			
	a Temporary Footpaths / diversions	1 item	25,000.00	25,000
	b Temporary haul roads	1 item	35,000.00	35,000
	c Temporary estate holding costs (H&S etc)	1 item	50,000.00	50,000
	d Temporary signage	1 item	15,000.00	15,000
<b>5.02</b>	<b>Preliminaries</b>			
	a Site establishment, supervision and management on capital works	10 %	125,000.00	12,500
	<b>Preliminaries Total</b>			<b>12,500</b>
<b>5.03</b>	<b>Contingency and Risk</b>			
	a Design and Price Risk	2 %	137,500.00	2,750
	b Construction Contingency	3 %	137,500.00	4,125
	c Specific risk provisions:			0
	<b>Contingency and Risk Total</b>			<b>6,875</b>
<b>5.04</b>	<b>Fees and other charges</b>			
	a Fees - design and delivery fees on capital works	10 %	125,000.00	12,500
	<b>Fees and other charges Total</b>			<b>12,500</b>
	<b>TEMPORARY WORKS Total</b>			<b>156,875</b>

## **Appendix 3: Turley Appraisal Comparison**

BNP						
Warrington Borough Council - Sites allocation viability testing				Growth: Off		
SW Extension parcel 1	Site area	10.93	gross ha	Site area	18.69	gross ha
Development mix (square metres GIA)	Site area	8.33	net ha	Site area	8.33	net ha
	BNP Assumptions			Turley Assumptions		
Residential (units and development floor area)	250	29,125 sq m		292	27,806 sq m	
Affordable housing (% of total units)	30%			30%		
<b>Summary of inputs</b>						
Private housing sales value (£ per square metre)	2,799	175	units	2,799	21,296 sq m	205
Affordable rented value (£ per square metre)	1,449	50	units	1,400	4,340 sq m	58
Shared ownership value (£ per square metre)	1,959	25	units	1,959	2,170 sq m	29
Professional fees (% of total construction costs)	6%			8%		
Contingency (% of base build costs)	5%			3%		
Interest rate	6%			6.0%		
Marketing (% of private GDV)	3%			2.5%		
Profit on private housing (% of private housing GDV)	17%			20%		
Profit on affordable housing (% of affordable housing GDV)	6%			6%		
Profit on commercial (% on GDV)	17.5%			17.5%		
Build period (months)	24			33		
Sales period (months)	24			27		
<b>Summary viability</b>						
Private housing value (sq m; £ per sq m; total value)	20,388	2,799	57,057,273	21,296	2,799	59,607,504
Affordable rented housing value (sq m; £ per sq m; total value)	8,738	1,617	14,131,297	4,340	1,400	6,076,000
Shared ownership housing value (sq m; £ per sq m; total value)				2,170	1,959	4,251,030
Total residential value (sq m; total value)	<b>29,126</b>		<b>71,188,570</b>	<b>27,806</b>		<b>69,934,534</b>
Commercial value (sq m; £ per sq m; total value)	500	3,346	1,672,761	500	3,346	1,672,761
<b>Gross Development Value</b>			<b>72,861,332</b>			<b>71,607,295</b>
<b>Residential Build</b>						
Resi Base build (£1,030 psm)				27,806	1,030	28,639,818
Resi External Works % of base costs					15%	4,295,973
Resi Energy Requirements % of base costs					6%	1,718,389
Resi On site infrastructure (per unit)					7,986	2,331,912
Resi Strategic infrastructure (per unit)					16,322	4,766,000
Resi Contingency % of total costs costs					3%	1,281,033
Total residential build						<b>43,033,124</b>
<b>Commercial Build</b>						
Comm Base Build				500	1,294	647,000
Comm External Works % of base costs					10%	64,700
Comm Energy Requirements % of base costs					2%	12,940
Comm Contingency % of total costs					3%	21,739
Total commercial build						<b>746,379</b>
Total Build costs incl contingency	29,625 sqm	£1,561 per sqm	<b>46,244,844</b>	28,306	1,547	<b>43,779,504</b>
Garages				146	6,500	949,000
Fees			2,774,691			3,039,801
Sales and marketing			1,997,005			1,532,007
Residential CIL						
Residential S106			2,135,500			2,494,264
Accessibility standards			309,725			361,759
<b>Total development costs</b>			<b>51,016,540</b>			<b>52,156,334</b>
Developer's profit			10,119,547			12,833,856
Interest on build			1,976,022			211,177
Interest on land			3,640,251			552,954
Gross Residual Land Value			6,108,972			5,852,974
Stamp duty, agents and legal fees			415,410			364,372
<b>NET RESIDUAL LAND VALUE</b>	Per ha	£520,980	<b>5,693,562</b>	Per ha	£293,665	<b>5,488,602</b>
Benchmark land value	Per ha	£247,000	2,699,357	Per ha	£371,000	6,933,990
<b>Result</b>			<b>VIABLE</b>			<b>UNVIABLE</b>

**Appendix 4: Turley Parcel 1 Appraisal: WBC  
Infrastructure Costs**



SWUE Parcel 1 Appraisal  
Warrington Infrastructure

**SWUE Parcel 1 Appraisal  
Warrington Infrastructure**

**Appraisal Summary for Phase 1**

Currency in £

**REVENUE**

Sales Valuation	Units	m <sup>2</sup>	Sales Rate m <sup>2</sup>	Unit Price	Gross Sales
Market Housing	205	21,296.00	2,799.00	290,768	59,607,504
Affordable Rented	58	4,340.00	1,400.00	104,759	6,076,000
Shared Ownership	29	2,170.00	1,959.00	146,587	4,251,030
Commercial	<u>1</u>	<u>500.00</u>	3,345.52	1,672,761	<u>1,672,761</u>
<b>Totals</b>	<b>293</b>	<b>28,306.00</b>			<b>71,607,295</b>

**NET REALISATION**

**71,607,295**

**OUTLAY**

**ACQUISITION COSTS**

Residualised Price (18.69 Ha @ 294,667.35 /Hect)		5,507,333		5,507,333
Stamp Duty	4.80%	264,352		
Agent Fee	1.00%	55,073		
Legal Fee	0.50%	27,537		
				346,962

**CONSTRUCTION COSTS**

Construction	m <sup>2</sup>	Build Rate m <sup>2</sup>	Cost	
Market Housing	21,296.00	1,030.00	21,934,880	
Affordable Rented	4,340.00	1,030.00	4,470,200	
Shared Ownership	2,170.00	1,030.00	2,235,100	
Commercial	<u>500.00</u>	1,294.00	<u>647,000</u>	
<b>Totals</b>	<b>28,306.00 m<sup>2</sup></b>		<b>29,287,180</b>	
Resi Contingency		3.00%	1,281,047	
Comm Contingency		3.00%	21,739	
S106			2,494,264	
Accessibility Standards			361,759	
				33,445,989
<b>Other Construction</b>				
Resi External Works		15.00%	4,296,027	
Comm External Works		10.00%	64,700	
Resi Energy Requirements		6.00%	1,718,411	
Comm Energy Requirements		2.00%	12,940	
Resi On site Infrastructure	292.00 un	7,986.00 /un	2,331,912	
Resi Strategic Infrastructure	292.00 un	16,322.00 /un	4,766,024	
Garages			949,000	
				14,139,014

**PROFESSIONAL FEES**

Professional Fees	7.00%	3,039,834		3,039,834
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**DISPOSAL FEES**

Sales Agent & Marketing Fee	2.50%	1,532,007		1,532,007
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**FINANCE**

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)				
Land			552,954	
Construction			211,177	
Total Finance Cost				764,131

**TOTAL COSTS**

**58,775,269**

**PROFIT**

**12,832,026**

**Performance Measures**

Profit on Cost%	21.83%
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**SWUE Parcel 1 Appraisal  
Warrington Infrastructure**

Profit on GDV%	17.92%
Profit on NDV%	17.92%
IRR	52.88%
Profit Erosion (finance rate 6.000)	3 yrs 4 mths

**SWUE Parcel 1 Appraisal  
Warrington Infrastructure**

**Detailed Cash flow Phase 1**

	001:Apr 2019	002:May 2019	003:Jun 2019	004:Jul 2019	005:Aug 2019	006:Sep 2019
Monthly B/F	0	(5,854,295)	(5,883,566)	(5,912,838)	(7,168,989)	(8,469,881)
<b>Revenue</b>						
Sale - Market Housing	0	0	0	0	0	0
Sale - Affordable Rented	0	0	0	0	0	0
Sale - Shared Ownership	0	0	0	0	0	0
Sale - Commercial	0	0	0	0	0	0
<b>Disposal Costs</b>						
Sales Agent & Marketing Fee	0	0	0	0	0	0
<b>Unit Information</b>						
<b>Market Housing</b>						
<b>Affordable Rented</b>						
<b>Shared Ownership</b>						
<b>Commercial</b>						
<b>Acquisition Costs</b>						
Residualised Price	(5,507,333)	0	0	0	0	0
Stamp Duty	(264,352)	0	0	0	0	0
Agent Fee	(55,073)	0	0	0	0	0
Legal Fee	(27,537)	0	0	0	0	0
<b>Construction Costs</b>						
Con. - Market Housing	0	0	0	(664,693)	(664,693)	(664,693)
Con. - Affordable Rented	0	0	0	(135,461)	(135,461)	(135,461)
Con. - Shared Ownership	0	0	0	(67,730)	(67,730)	(67,730)
Con. - Commercial	0	0	0	(19,606)	(19,606)	(19,606)
Resi External Works	0	0	0	(130,183)	(130,183)	(130,183)
Comm External Works	0	0	0	(1,961)	(1,961)	(1,961)
Resi Energy Requirements	0	0	0	(52,073)	(52,073)	(52,073)
Comm Energy Requirements	0	0	0	(392)	(392)	(392)
Resi On site Infrastructure	0	0	0	(9,567)	(19,738)	(29,294)
Resi Strategic Infrastructure	0	0	0	(19,554)	(40,341)	(59,872)
Garages	0	0	0	(3,894)	(8,033)	(11,922)
Resi Contingency	0	0	0	(32,495)	(33,548)	(34,537)
Comm Contingency	0	0	0	(659)	(659)	(659)
S106	0	0	0	0	0	0
Accessibility Standards	0	0	0	(10,962)	(10,962)	(10,962)
<b>Professional Fees</b>						
Professional Fees	0	0	0	(77,358)	(79,815)	(82,123)
<b>Net Cash Flow Before Finance</b>	<b>(5,854,295)</b>	<b>0</b>	<b>0</b>	<b>(1,226,587)</b>	<b>(1,265,194)</b>	<b>(1,301,468)</b>
Debit Rate 6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(29,271)	(29,271)	(29,564)	(35,697)	(42,023)
<b>Net Cash Flow After Finance</b>	<b>(5,854,295)</b>	<b>(29,271)</b>	<b>(29,271)</b>	<b>(1,256,152)</b>	<b>(1,300,892)</b>	<b>(1,343,491)</b>
Cumulative Net Cash Flow Monthly	(5,854,295)	(5,883,566)	(5,912,838)	(7,168,989)	(8,469,881)	(9,813,372)

**SWUE Parcel 1 Appraisal  
Warrington Infrastructure**

**Detailed Cash flow Phase 1**

007:Oct 2019 (9,813,372)	008:Nov 2019 (11,197,847)	009:Dec 2019 (12,620,606)	010:Jan 2020 (14,079,473)	011:Feb 2020 (14,272,304)	012:Mar 2020 (13,243,286)	013:Apr 2020 (12,231,106)	014:May 2020 (11,234,381)
0	0	0	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685
0	0	0	225,037	225,037	225,037	225,037	225,037
0	0	0	157,446	157,446	157,446	157,446	157,446
0	0	0	0	0	0	0	0
0	0	0	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)
(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)
(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)
(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)
(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)
(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)
(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)
(392)	(392)	(392)	(392)	(392)	(392)	(392)	(392)
(38,236)	(46,562)	(54,274)	(61,371)	(67,854)	(73,721)	(78,974)	(83,612)
(78,147)	(95,165)	(110,927)	(125,432)	(138,681)	(150,674)	(161,410)	(170,889)
(15,560)	(18,949)	(22,088)	(24,976)	(27,614)	(30,002)	(32,140)	(34,027)
(35,462)	(36,324)	(37,123)	(37,858)	(38,529)	(39,136)	(39,680)	(40,160)
(659)	(659)	(659)	(659)	(659)	(659)	(659)	(659)
0	0	0	(1,247,132)	0	0	0	0
(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)
(84,283)	(86,294)	(88,157)	(89,871)	(91,437)	(92,855)	(94,124)	(95,244)
<b>(1,335,408)</b>	<b>(1,367,015)</b>	<b>(1,396,288)</b>	<b>(135,384)</b>	<b>1,087,141</b>	<b>1,064,869</b>	<b>1,044,929</b>	<b>1,027,323</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(49,067)	(55,744)	(62,579)	(57,447)	(58,123)	(52,688)	(48,205)	(42,980)
<b>(1,384,475)</b>	<b>(1,422,759)</b>	<b>(1,458,867)</b>	<b>(192,831)</b>	<b>1,029,018</b>	<b>1,012,181</b>	<b>996,724</b>	<b>984,343</b>
(11,197,847)	(12,620,606)	(14,079,473)	(14,272,304)	(13,243,286)	(12,231,106)	(11,234,381)	(10,250,038)

**SWUE Parcel 1 Appraisal  
Warrington Infrastructure**

**Detailed Cash flow Phase 1**

015:Jun 2020 (10,250,038)	016:Jul 2020 (9,275,831)	017:Aug 2020 (8,310,147)	018:Sep 2020 (7,350,074)	019:Oct 2020 (6,393,330)	020:Nov 2020 (5,438,051)	021:Dec 2020 (4,481,505)	022:Jan 2021 (3,521,378)
2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685
225,037	225,037	225,037	225,037	225,037	225,037	225,037	225,037
157,446	157,446	157,446	157,446	157,446	157,446	157,446	157,446
0	0	0	0	0	0	0	0
(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)
(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)
(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)
(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)
(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)
(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)
(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)
(392)	(392)	(392)	(392)	(392)	(392)	(392)	(392)
(87,636)	(91,045)	(93,839)	(96,018)	(97,582)	(98,532)	(98,867)	(98,587)
(179,113)	(186,079)	(191,790)	(196,244)	(199,441)	(201,382)	(202,067)	(201,496)
(35,664)	(37,052)	(38,189)	(39,076)	(39,712)	(40,099)	(40,235)	(40,121)
(40,577)	(40,929)	(41,219)	(41,444)	(41,606)	(41,705)	(41,739)	(41,710)
(659)	(659)	(659)	(659)	(659)	(659)	(659)	(659)
0	0	0	0	0	0	0	0
(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)
(96,216)	(97,039)	(97,714)	(98,241)	(98,618)	(98,848)	(98,929)	(98,861)
<b>1,012,051</b>	<b>999,112</b>	<b>988,506</b>	<b>980,234</b>	<b>974,295</b>	<b>970,690</b>	<b>969,418</b>	<b>970,480</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(37,843)	(33,428)	(28,433)	(23,490)	(19,016)	(14,144)	(9,291)	(4,656)
<b>974,207</b>	<b>965,683</b>	<b>960,073</b>	<b>956,744</b>	<b>955,279</b>	<b>956,546</b>	<b>960,127</b>	<b>965,824</b>
(9,275,831)	(8,310,147)	(7,350,074)	(6,393,330)	(5,438,051)	(4,481,505)	(3,521,378)	(2,555,554)

**SWUE Parcel 1 Appraisal  
Warrington Infrastructure**

**Detailed Cash flow Phase 1**

023:Feb 2021 (2,555,554)	024:Mar 2021 (2,828,810)	025:Apr 2021 (1,850,376)	026:May 2021 (862,710)	027:Jun 2021 135,351	028:Jul 2021 1,146,142	029:Aug 2021 2,171,995	030:Sep 2021 3,215,244
2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685
225,037	225,037	225,037	225,037	225,037	225,037	225,037	225,037
157,446	157,446	157,446	157,446	157,446	157,446	157,446	157,446
0	0	0	0	0	0	0	0
(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)
(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)
(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)
(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)
(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)
(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)
(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)
(392)	(392)	(392)	(392)	(392)	(392)	(392)	(392)
(97,693)	(96,184)	(94,060)	(91,321)	(87,968)	(84,000)	(79,417)	(74,219)
(199,667)	(196,583)	(192,242)	(186,645)	(179,791)	(171,681)	(162,314)	(151,691)
(39,757)	(39,143)	(38,279)	(37,164)	(35,800)	(34,185)	(32,320)	(30,204)
(41,618)	(41,461)	(41,242)	(40,958)	(40,611)	(40,200)	(39,726)	(39,188)
(659)	(659)	(659)	(659)	(659)	(659)	(659)	(659)
(1,247,132)	0	0	0	0	0	0	0
(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)
(98,645)	(98,281)	(97,768)	(97,106)	(96,296)	(95,337)	(94,230)	(92,975)
<b>(273,257)</b>	<b>979,604</b>	<b>987,666</b>	<b>998,062</b>	<b>1,010,791</b>	<b>1,025,853</b>	<b>1,043,249</b>	<b>1,062,978</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
0	(1,170)	0	0	0	0	0	0
<b>(273,257)</b>	<b>978,434</b>	<b>987,666</b>	<b>998,062</b>	<b>1,010,791</b>	<b>1,025,853</b>	<b>1,043,249</b>	<b>1,062,978</b>
(2,828,810)	(1,850,376)	(862,710)	135,351	1,146,142	2,171,995	3,215,244	4,278,222

**SWUE Parcel 1 Appraisal  
Warrington Infrastructure**

**Detailed Cash flow Phase 1**

031:Oct 2021	032:Nov 2021	033:Dec 2021	034:Jan 2022	035:Feb 2022	036:Mar 2022
4,278,222	5,363,264	6,472,701	7,608,869	8,774,099	9,970,727
2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685
225,037	225,037	225,037	225,037	225,037	225,037
157,446	157,446	157,446	157,446	157,446	157,446
0	0	0	0	0	1,672,761
(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(97,011)
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)
(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)
(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)
(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)
(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)
(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)
(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)
(392)	(392)	(392)	(392)	(392)	(392)
(68,407)	(61,980)	(54,938)	(47,281)	(39,010)	(30,124)
(139,812)	(126,676)	(112,284)	(96,635)	(79,730)	(61,569)
(27,839)	(25,223)	(22,358)	(19,242)	(15,876)	(12,259)
(38,586)	(37,921)	(37,192)	(36,399)	(35,543)	(34,623)
(659)	(659)	(659)	(659)	(659)	(659)
0	0	0	0	0	0
(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)
(91,571)	(90,018)	(88,317)	(86,468)	(84,470)	(82,324)
<b>1,085,041</b>	<b>1,109,438</b>	<b>1,136,167</b>	<b>1,165,231</b>	<b>1,196,627</b>	<b>2,861,299</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
0	0	0	0	0	0
<b>1,085,041</b>	<b>1,109,438</b>	<b>1,136,167</b>	<b>1,165,231</b>	<b>1,196,627</b>	<b>2,861,299</b>
5,363,264	6,472,701	7,608,869	8,774,099	9,970,727	12,832,026



## **Appendix 5: 474/P/PL01 Barratt Homes Planning Layout**

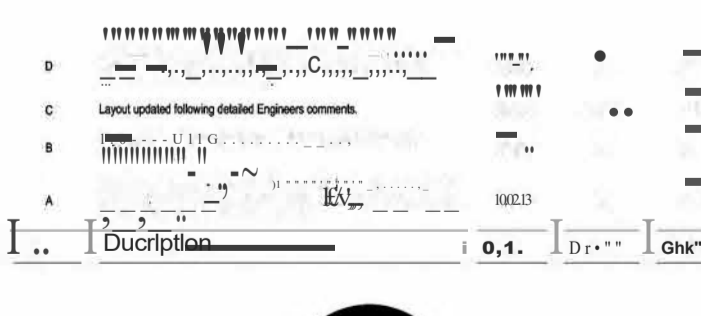
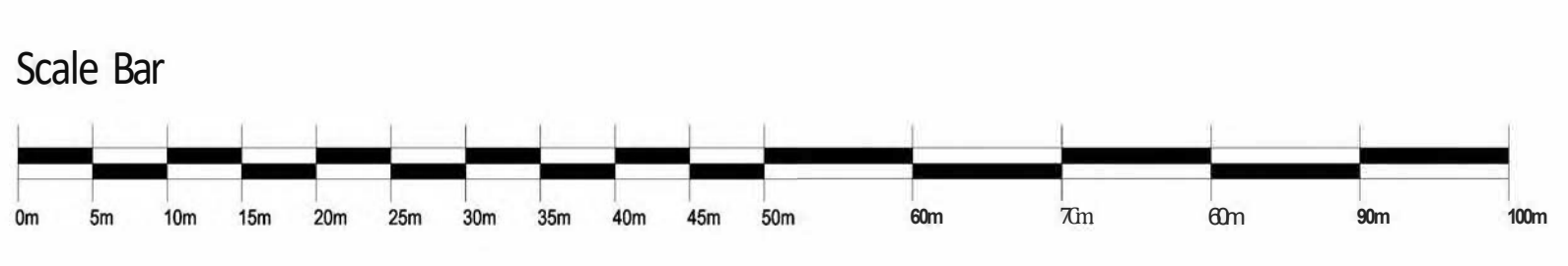
**WARNING TO HOUSE PURCHASERS**  
 Property Misdescriptions Act 1001

THIS PLAN IS THE PROPERTY OF PEWTERSPEAR WARRINGTON AND SHOULD NOT BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF PEWTERSPEAR WARRINGTON. THIS PLAN IS NOT TO BE USED AS A CONTRACT AND IS SUBJECT TO THE TERMS AND CONDITIONS OF THE RELEVANT CONTRACT.

SCHEDULE OF ACCOMMODATION						
Ref	Barratt Type	House Type	Split	No	Total Sqft	
<b>Site A (Lower Site)</b>						
Accessible Units						
Was	Washington	2 bed mews house		6	3684	
Bar	Barton	3 bed mews house		6	4236	
Ffk	Folkestone	3 bed semi detached house		4	3320	
Nor	Norbury	3 bed mews house		6	3642	
Ern	Ernestale	3 bed semi detached house		3	2751	
Private Units						
Ffk	Folkestone	3 bed semi detached house		2	1900	
Ern	Ernestale	3 bed semi detached house		5	4585	
Esk	Esksdale	3 bed detached house		4	4232	
Nor	Norbury	3 bed mews house		2	2214	
Haw	Hawley	4 bed mews townhouse		4	4664	
Ker	Kerriford	4 bed detached house		7	7973	
Hem	Hemsworth	4 bed detached house		10	11520	
Ala	Alberney	4 bed detached house		7	8575	
Lam	Lambton	5 bed detached house		18	16520	
					76	
<b>Site B (Upper Site)</b>						
Affordable Units						
Was	Washington	2 bed mews house		1	1218	
Bar	Barton	3 bed mews house		11	7788	
Ffk	Folkestone	3 bed semi detached house		7	5810	
Nor	Norbury	3 bed mews house		9	9963	
Private Units						
Ffk	Folkestone	3 bed semi detached house		1	830	
Ern	Ernestale	3 bed semi detached house		5	4866	
Esk	Esksdale	3 bed detached house		13	13764	
Haw	Hawley	4 bed mews townhouse		10	4664	
Tew	Tewkesbury	4 bed detached house		11	12551	
Rad	Radleigh	4 bed detached house		12	15804	
Hal	Hale	4 bed detached house		13	17147	
Aln	Anmuth	4 bed detached house		18	25104	
					104	
Total number of units and square footage					180	200762
Gross Site Area in Acres					18.45	
Unrecoverable Area in Acres					4.78	
Net Site Area in Acres					13.67	
Density (units per acre)					13	
Density (units per hectare)					33	
Square foot / Acre					14,688	



- Legend**
- Proposed dwelling and house type code.
  - Proposed garage to be built.
  - Dwelling handing - as I opposite the construction stage.
  - AF** Affordable Housing
  - AM** Acoustic Measures required. (Refer to Noise Assessment for Details)
  - Timber Fence. (Refer to BTL01/BTD01&02 for details)
  - Wall. (Refer to BTL01/BTD01&02 for details)
  - Estate Railings. (Refer to BTL01/BTD01&02 for details)
  - Timber knee railing. (Refer to BTL01/BTD01&02 for details)
  - Ball top railing. (Refer to BTL01/BTD01&02 for details)
  - Timber gates to be erected to rear gardens. (as indicated on site layout).
  - Indicative position of new tree planting. (Refer to Landscape Layout for further details).
  - Indicates existing trees to be retained and protected during construction at all times.
  - Location of easement.



**BARRATT HOMES**  
**MANCHESTER**  
 Barratt Homes Manchester  
 (A division of BDW Trading Ltd)  
 4 Brindley Road  
 City Park  
 Manchester  
 M16 6RQ  
 Tel: 0161 872 0161  
 Fax: 0161 855 2828

Job	PEWTERSPEAR WARRINGTON
Title	PLANNING LAYOUT
Drawn By	BM
Check By	BM
Date	06/01/15
Scale	AS SHOWN
Drawn Number	474/PL/01
Rev	D

**Appendix 6: Turley Parcel 1 Appraisal: RLB  
Infrastructure Costs**

SWUE Parcel 1 Appraisal  
RLB Infrastructure

**SWUE Parcel 1 Appraisal  
RLB Infrastructure**

**Appraisal Summary for Phase 1**

Currency in £

**REVENUE**

Sales Valuation	Units	m <sup>2</sup>	Sales Rate m <sup>2</sup>	Unit Price	Gross Sales
Market Housing	205	21,296.00	2,799.00	290,768	59,607,504
Affordable Rented	58	4,340.00	1,400.00	104,759	6,076,000
Shared Ownership	29	2,170.00	1,959.00	146,587	4,251,030
Commercial	<u>1</u>	<u>500.00</u>	3,345.52	1,672,761	<u>1,672,761</u>
<b>Totals</b>	<b>293</b>	<b>28,306.00</b>			<b>71,607,295</b>

**NET REALISATION**

**71,607,295**

**OUTLAY**

**ACQUISITION COSTS**

Residualised Price (18.69 Ha @ 374,997.26 /Hect)		7,008,699		7,008,699
Stamp Duty	4.85%	339,922		
Agent Fee	1.00%	70,087		
Legal Fee	0.50%	35,043		
				445,052

**CONSTRUCTION COSTS**

Construction	m <sup>2</sup>	Build Rate m <sup>2</sup>	Cost	
Market Housing	21,296.00	1,030.00	21,934,880	
Affordable Rented	4,340.00	1,030.00	4,470,200	
Shared Ownership	2,170.00	1,030.00	2,235,100	
Commercial	<u>500.00</u>	1,294.00	<u>647,000</u>	
<b>Totals</b>	<b>28,306.00 m<sup>2</sup></b>		<b>29,287,180</b>	
Resi Contingency		3.00%	1,233,392	
Comm Contingency		3.00%	21,739	
S106			2,494,264	
Accessibility Standards			361,759	
				33,398,334
<b>Other Construction</b>				
Resi External Works		15.00%	4,296,027	
Comm External Works		10.00%	64,700	
Resi Energy Requirements		6.00%	1,718,411	
Comm Energy Requirements		2.00%	12,940	
RLB On & Off site Infrastructure	292.00 un	18,868.00 /un	5,509,456	
Garages			949,000	
				12,550,534

**PROFESSIONAL FEES**

Professional Fees	7.00%	2,928,640		2,928,640
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**DISPOSAL FEES**

Sales Agent & Marketing Fee	2.50%	1,532,007		1,532,007
-----------------------------	-------	-----------	--	-----------

**FINANCE**

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)				
Land			712,568	
Construction			199,434	
Total Finance Cost				912,002

**TOTAL COSTS**

**58,775,268**

**PROFIT**

**12,832,027**

**Performance Measures**

Profit on Cost%	21.83%
Profit on GDV%	17.92%

**SWUE Parcel 1 Appraisal****RLB Infrastructure**

Profit on NDV%	17.92%
IRR	47.89%
Profit Erosion (finance rate 6.000)	3 yrs 4 mths

**SWUE Parcel 1 Appraisal  
RLB Infrastructure**

**Detailed Cash flow Phase 1**

	001:Apr 2019	002:May 2019	003:Jun 2019	004:Jul 2019	005:Aug 2019	006:Sep 2019
Monthly B/F	0	(7,453,751)	(7,491,020)	(7,528,289)	(8,785,349)	(10,079,492)
<b>Revenue</b>						
Sale - Market Housing	0	0	0	0	0	0
Sale - Affordable Rented	0	0	0	0	0	0
Sale - Shared Ownership	0	0	0	0	0	0
Sale - Commercial	0	0	0	0	0	0
<b>Disposal Costs</b>						
Sales Agent & Marketing Fee	0	0	0	0	0	0
<b>Unit Information</b>						
<b>Market Housing</b>						
<b>Affordable Rented</b>						
<b>Shared Ownership</b>						
<b>Commercial</b>						
<b>Acquisition Costs</b>						
Residualised Price	(7,008,699)	0	0	0	0	0
Stamp Duty	(339,922)	0	0	0	0	0
Agent Fee	(70,087)	0	0	0	0	0
Legal Fee	(35,043)	0	0	0	0	0
<b>Construction Costs</b>						
Con. - Market Housing	0	0	0	(664,693)	(664,693)	(664,693)
Con. - Affordable Rented	0	0	0	(135,461)	(135,461)	(135,461)
Con. - Shared Ownership	0	0	0	(67,730)	(67,730)	(67,730)
Con. - Commercial	0	0	0	(19,606)	(19,606)	(19,606)
Resi External Works	0	0	0	(130,183)	(130,183)	(130,183)
Comm External Works	0	0	0	(1,961)	(1,961)	(1,961)
Resi Energy Requirements	0	0	0	(52,073)	(52,073)	(52,073)
Comm Energy Requirements	0	0	0	(392)	(392)	(392)
RLB On & Off site Infrastructure	0	0	0	(22,604)	(46,634)	(69,212)
Garages	0	0	0	(3,894)	(8,033)	(11,922)
Resi Contingency	0	0	0	(32,299)	(33,144)	(33,938)
Comm Contingency	0	0	0	(659)	(659)	(659)
S106	0	0	0	0	0	0
Accessibility Standards	0	0	0	(10,962)	(10,962)	(10,962)
<b>Professional Fees</b>						
Professional Fees	0	0	0	(76,902)	(78,874)	(80,726)
<b>Net Cash Flow Before Finance</b>	<b>(7,453,751)</b>	<b>0</b>	<b>0</b>	<b>(1,219,418)</b>	<b>(1,250,404)</b>	<b>(1,279,518)</b>
Debit Rate 6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
Credit Rate 0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
Finance Costs (All Sets)	0	(37,269)	(37,269)	(37,641)	(43,739)	(49,991)
<b>Net Cash Flow After Finance</b>	<b>(7,453,751)</b>	<b>(37,269)</b>	<b>(37,269)</b>	<b>(1,257,060)</b>	<b>(1,294,143)</b>	<b>(1,329,508)</b>
Cumulative Net Cash Flow Monthly	(7,453,751)	(7,491,020)	(7,528,289)	(8,785,349)	(10,079,492)	(11,409,000)

**SWUE Parcel 1 Appraisal  
RLB Infrastructure**

**Detailed Cash flow Phase 1**

007:Oct 2019 (11,409,000)	008:Nov 2019 (12,772,803)	009:Dec 2019 (14,168,507)	010:Jan 2020 (15,594,366)	011:Feb 2020 (15,748,785)	012:Mar 2020 (14,676,269)	013:Apr 2020 (13,615,938)	014:May 2020 (12,566,961)
0	0	0	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685
0	0	0	225,037	225,037	225,037	225,037	225,037
0	0	0	157,446	157,446	157,446	157,446	157,446
0	0	0	0	0	0	0	0
0	0	0	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)
(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)
(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)
(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)
(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)
(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)
(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)
(392)	(392)	(392)	(392)	(392)	(392)	(392)	(392)
(90,337)	(110,010)	(128,230)	(144,998)	(160,313)	(174,176)	(186,587)	(197,546)
(15,560)	(18,949)	(22,088)	(24,976)	(27,614)	(30,002)	(32,140)	(34,027)
(34,681)	(35,373)	(36,014)	(36,603)	(37,142)	(37,630)	(38,066)	(38,451)
(659)	(659)	(659)	(659)	(659)	(659)	(659)	(659)
0	0	0	(1,247,132)	0	0	0	0
(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)
(82,460)	(84,074)	(85,569)	(86,945)	(88,202)	(89,339)	(90,358)	(91,257)
<b>(1,306,758)</b>	<b>(1,332,125)</b>	<b>(1,355,620)</b>	<b>(89,398)</b>	<b>1,137,985</b>	<b>1,120,109</b>	<b>1,104,105</b>	<b>1,089,975</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(57,045)	(63,579)	(70,239)	(65,021)	(65,468)	(59,778)	(55,129)	(49,608)
<b>(1,363,803)</b>	<b>(1,395,704)</b>	<b>(1,425,859)</b>	<b>(154,419)</b>	<b>1,072,517</b>	<b>1,060,331</b>	<b>1,048,977</b>	<b>1,040,367</b>
(12,772,803)	(14,168,507)	(15,594,366)	(15,748,785)	(14,676,269)	(13,615,938)	(12,566,961)	(11,526,595)



**SWUE Parcel 1 Appraisal  
RLB Infrastructure**

**Detailed Cash flow Phase 1**

015:Jun 2020 (11,526,595)	016:Jul 2020 (10,493,036)	017:Aug 2020 (9,465,218)	018:Sep 2020 (8,440,575)	019:Oct 2020 (7,417,278)	020:Nov 2020 (6,393,999)	021:Dec 2020 (5,368,376)	022:Jan 2021 (4,338,551)
2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685
225,037	225,037	225,037	225,037	225,037	225,037	225,037	225,037
157,446	157,446	157,446	157,446	157,446	157,446	157,446	157,446
0	0	0	0	0	0	0	0
(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)
(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)
(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)
(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)
(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)
(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)
(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)
(392)	(392)	(392)	(392)	(392)	(392)	(392)	(392)
(207,052)	(215,105)	(221,706)	(226,855)	(230,551)	(232,795)	(233,587)	(232,926)
(35,664)	(37,052)	(38,189)	(39,076)	(39,712)	(40,099)	(40,235)	(40,121)
(38,786)	(39,069)	(39,301)	(39,482)	(39,612)	(39,691)	(39,719)	(39,696)
(659)	(659)	(659)	(659)	(659)	(659)	(659)	(659)
0	0	0	0	0	0	0	0
(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)
(92,037)	(92,698)	(93,240)	(93,662)	(93,965)	(94,149)	(94,214)	(94,160)
<b>1,077,717</b>	<b>1,067,332</b>	<b>1,058,820</b>	<b>1,052,181</b>	<b>1,047,415</b>	<b>1,044,521</b>	<b>1,043,501</b>	<b>1,044,353</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(44,158)	(39,514)	(34,178)	(28,884)	(24,136)	(18,898)	(13,676)	(8,742)
<b>1,033,559</b>	<b>1,027,818</b>	<b>1,024,643</b>	<b>1,023,298</b>	<b>1,023,279</b>	<b>1,025,623</b>	<b>1,029,825</b>	<b>1,035,611</b>
(10,493,036)	(9,465,218)	(8,440,575)	(7,417,278)	(6,393,999)	(5,368,376)	(4,338,551)	(3,302,940)

**SWUE Parcel 1 Appraisal  
RLB Infrastructure**

**Detailed Cash flow Phase 1**

023:Feb 2021 (3,302,940)	024:Mar 2021 (3,506,515)	025:Apr 2021 (2,459,360)	026:May 2021 (1,401,213)	027:Jun 2021 (334,724)	028:Jul 2021 741,982	029:Aug 2021 1,830,777	030:Sep 2021 2,933,534
2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685
225,037	225,037	225,037	225,037	225,037	225,037	225,037	225,037
157,446	157,446	157,446	157,446	157,446	157,446	157,446	157,446
0	0	0	0	0	0	0	0
(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(55,192)
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)
(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)
(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)
(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)
(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)
(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)
(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)
(392)	(392)	(392)	(392)	(392)	(392)	(392)	(392)
(230,813)	(227,247)	(222,229)	(215,759)	(207,836)	(198,461)	(187,633)	(175,353)
(39,757)	(39,143)	(38,279)	(37,164)	(35,800)	(34,185)	(32,320)	(30,204)
(39,621)	(39,496)	(39,319)	(39,092)	(38,813)	(38,484)	(38,103)	(37,671)
(659)	(659)	(659)	(659)	(659)	(659)	(659)	(659)
(1,247,132)	0	0	0	0	0	0	0
(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)
(93,987)	(93,694)	(93,282)	(92,752)	(92,101)	(91,332)	(90,444)	(89,436)
<b>(200,054)</b>	<b>1,051,676</b>	<b>1,058,146</b>	<b>1,066,490</b>	<b>1,076,706</b>	<b>1,088,795</b>	<b>1,102,757</b>	<b>1,118,592</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
(3,520)	(4,520)	0	0	0	0	0	0
<b>(203,574)</b>	<b>1,047,155</b>	<b>1,058,146</b>	<b>1,066,490</b>	<b>1,076,706</b>	<b>1,088,795</b>	<b>1,102,757</b>	<b>1,118,592</b>
(3,506,515)	(2,459,360)	(1,401,213)	(334,724)	741,982	1,830,777	2,933,534	4,052,126

**SWUE Parcel 1 Appraisal  
RLB Infrastructure**

**Detailed Cash flow Phase 1**

031:Oct 2021	032:Nov 2021	033:Dec 2021	034:Jan 2022	035:Feb 2022	036:Mar 2022
4,052,126	5,188,425	6,344,305	7,521,638	8,722,297	9,948,155
2,207,685	2,207,685	2,207,685	2,207,685	2,207,685	2,207,685
225,037	225,037	225,037	225,037	225,037	225,037
157,446	157,446	157,446	157,446	157,446	157,446
0	0	0	0	0	1,672,761
(55,192)	(55,192)	(55,192)	(55,192)	(55,192)	(97,011)
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0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
(664,693)	(664,693)	(664,693)	(664,693)	(664,693)	(664,693)
(135,461)	(135,461)	(135,461)	(135,461)	(135,461)	(135,461)
(67,730)	(67,730)	(67,730)	(67,730)	(67,730)	(67,730)
(19,606)	(19,606)	(19,606)	(19,606)	(19,606)	(19,606)
(130,183)	(130,183)	(130,183)	(130,183)	(130,183)	(130,183)
(1,961)	(1,961)	(1,961)	(1,961)	(1,961)	(1,961)
(52,073)	(52,073)	(52,073)	(52,073)	(52,073)	(52,073)
(392)	(392)	(392)	(392)	(392)	(392)
(161,620)	(146,436)	(129,798)	(111,709)	(92,167)	(71,172)
(27,839)	(25,223)	(22,358)	(19,242)	(15,876)	(12,259)
(37,188)	(36,654)	(36,069)	(35,433)	(34,745)	(34,007)
(659)	(659)	(659)	(659)	(659)	(659)
0	0	0	0	0	0
(10,962)	(10,962)	(10,962)	(10,962)	(10,962)	(10,962)
(88,309)	(87,063)	(85,698)	(84,213)	(82,610)	(80,887)
<b>1,136,299</b>	<b>1,155,880</b>	<b>1,177,333</b>	<b>1,200,659</b>	<b>1,225,858</b>	<b>2,883,872</b>
6.000%	6.000%	6.000%	6.000%	6.000%	6.000%
0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
0	0	0	0	0	0
<b>1,136,299</b>	<b>1,155,880</b>	<b>1,177,333</b>	<b>1,200,659</b>	<b>1,225,858</b>	<b>2,883,872</b>
5,188,425	6,344,305	7,521,638	8,722,297	9,948,155	12,832,027

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Manchester  
M1 4HD

T 0161 233 7676

**Turley**

# Warrington South West Urban Extension

## Development Prospectus

June 2019



**Turley**

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Manchester  
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**Telephone**  
0161 233 7676

**Date of issue**  
June 2019

**Client:**  
Peel Holdings (Management) Ltd, Story Homes Ltd  
and Ashall Property Ltd

**Our reference:**  
PEEM3056

**Manchester Ship Canal** ▶

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# 01 Introduction

This Development Prospectus sets out a vision and concept masterplan for the sustainable development of the Warrington South West Urban Extension ('SWUE'), which is identified as a housing allocation in the Proposed Submission version of the Warrington Local Plan.

This document has been prepared on behalf of Peel Holdings (Management) Ltd, Story Homes and Ashall Property, who are working together as a consortium to promote the SWUE site.

The SWUE Consortium members each have land interests within the SWUE allocation and are committed to continuing to work together, and with Warrington Borough Council (WBC), to secure the delivery of much-needed housing and associated infrastructure at the earliest opportunity.

The Consortium members have extensive experience of promoting land for development and delivering high-quality, sustainable residential communities.





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## Peel:

Peel Holdings (Management) Ltd is part of Peel Land and Property, which is in turn part of the Peel Group; one of the leading infrastructure, real estate, transport and investment enterprises in the UK. Peel Land and Property has extensive real estate assets which consist of 1.2 million sq m (13 million sq ft) of investment property and over 15,000 hectares (37,000 acres) of strategic land and water throughout the UK. The breadth of Peel Land and Property's assets covers transformational developments including MediaCityUK and Liverpool Waters.



---

## Story Homes:

Story Homes is a privately owned housebuilder with a long and successful reputation of building quality and high specification homes across the North West. A passion for quality and excellence has seen Story Homes become a multi award-winning UK property developer, with modern and attractive homes instantly inspiring buyers. Story Homes' success is underpinned by a determination to understand the needs of communities where they build and a goal to deliver design quality and high quality building specifications that enhance locations.



---

## Ashall Property:

Ashall Property is a private property and development investment company which focuses on creating investment value through property development and asset management. Ashall Property has been successfully developing residential and commercial property since the 1930s and, in recent years, has developed projects with an investment value in excess of £500 million.

## Context & Opportunity

The emerging Warrington Local Plan acknowledges a requirement to identify a suitable and sustainable portfolio of sites, including existing Green Belt sites, to meet its future housing needs over the period 2017 to 2037.

The Proposed Submission Version of the Local Plan ('PSLP') proposes the 'release' of land at Higher Walton from the Green Belt and its allocation for housing and related development over the plan period. The South West Urban Extension (SWUE) is expected to be developed as a sustainable urban extension to the main urban area of Warrington, to support a new community in a high quality residential setting with ease of access to Warrington's employment, recreation and cultural facilities.

The Consortium fully supports the allocation of the SWUE in the PSLP. The SWUE presents an opportunity to deliver a significant scale of new housing and associated infrastructure which will benefit both existing and new residents.

The development of the SWUE aligns with the overarching vision, objectives and spatial strategy of the PSLP. It also aligns with national policy which recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, including significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

## This Document

This document demonstrates that the SWUE site represents a sustainable opportunity capable of accommodating a desirable and high quality residential development. It will make a positive contribution to Warrington by integrating into the existing settlement, retaining and enhancing important features within and surrounding the site.

The remainder of this document is structured as follows:

- Overview of the relevant planning policy context
- Description of the site and its context
- An overview of the opportunities and constraints
- Presentation of a concept masterplan for the development of the site, including the site analysis and design process that has informed it
- An assessment of the proposals, to demonstrate that development of the site is suitable and achievable
- Confirmation of the Consortium's commitment to the comprehensive delivery of the site
- Summary of the community and socio-economic benefits that the development will secure
- Summary and conclusions



WARRINGTON  
WATERFRONT

WALTON

HIGHER WALTON

MOORE

Chester to Manchester Rail

Crewe to Warrington Rail

Manchester Ship Canal

HOLY HEDGE  
LANE

A56 Chester Road

# 02 Policy Context

## National Planning Policy Framework

The National Planning Policy Framework ('the Framework') came into effect in March 2012, and has been subject to a number of updates in the years since. The most recent iteration of the Framework was published in February 2019.

Sustainable development is at the heart of the Framework. For 'plan-making', this means that Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area (including for housing and affordable housing) with sufficient flexibility to adapt to rapid change.

The Framework recognises that the supply of large numbers of new homes can often be achieved through planning for larger scale development, including significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

Green Belt boundaries may be altered (but only in exceptional circumstances) through the preparation or updating of Local Plans. When defining Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. New Green Belt boundaries should, inter alia, reflect the Local Plan strategy for meeting identified requirements for sustainable development, identify areas of safeguarded land (where necessary) in order to meet longer-term development needs, be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period and define boundaries clearly, using recognisable physical features which are likely to be permanent.

## Warrington Local Plan

WBC is currently preparing a new Local Plan for Warrington which will guide development in the Borough over the plan period (2017 – 2037). The Proposed Submission version of the Local Plan was published for consultation in March 2019, and sets out the Council's proposed policies, including site allocations.

The PSLP recognises the need for Green Belt release in order to accommodate the borough's housing and economic requirements, and identifies the 'exceptional circumstances' required to justify Green Belt release. There is no other alternative than to release land from the Green Belt.

Land at Higher Walton is identified for removal from the Green Belt and allocated as a sustainable urban extension to the main urban area of Warrington. The SWUE is to be developed to support a new community in a high-quality residential setting with ease of access to Warrington's employment, recreation and cultural facilities. Policy MD3 of the PSLP indicates that the site will deliver around 1,600 homes alongside supporting infrastructure, including a new primary school and mixed-use local centre, areas of open space, landscape buffers and flood and ecological mitigation.

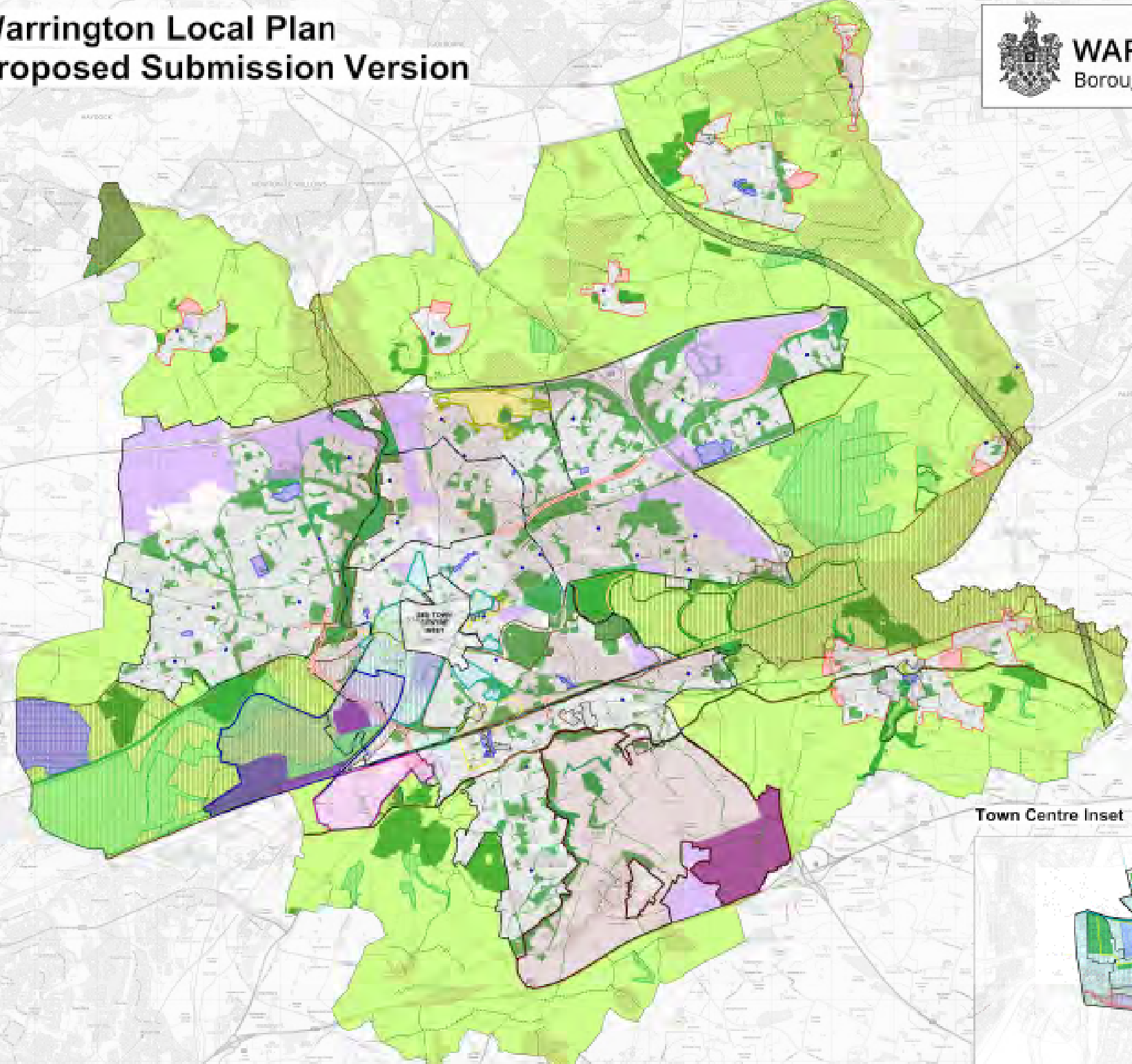
The Consortium considers that the site is capable of accommodating a higher number of dwellings than envisaged within the PSLP. The concept masterplan presented within this Development Prospectus shows capacity to deliver around 1,800 dwellings.

# Warrington Local Plan Proposed Submission Version

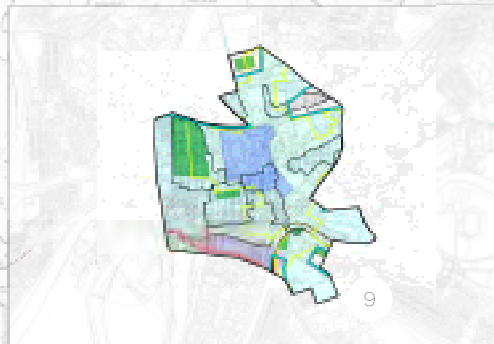


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Town Centre Inset



Scale  
Main Map - 1:22,000 at A0  
Inset - 1:12,000 at A0

# 03 Site Context

## Strategic Context

Warrington is a Unitary Authority adjoining the city regions of Liverpool and Manchester. It is well connected to both by the strategic transport network and is therefore well placed to capitalise on the growth ambitions for these areas and the wider North, as articulated through the Northern Powerhouse ambition.

The SWUE site adjoins the urban area of Warrington, and lies less than 2km south-west of its town centre and immediately adjacent to the neighbourhood of Walton. It also adjoins the wider Warrington Waterfront area, which is identified for significant housing and employment development over the plan period.

## The Site

The SWUE site comprises approximately 119 ha of land to the south-west of the built-up area of Warrington. It currently comprises a mix of agricultural land and associated buildings and property.

The site slopes to the north: the highest point is around 30m AOD adjacent to the Bridgewater Canal, falling to 10m AOD along the Manchester Ship Canal.

Mature trees are located adjacent to the Ship Canal and railway embankments. There is also an area of mature woodland vegetation associated with a watercourse that flows north through the centre of the site. Trees with TPOs are located in the hedgerows along Runcorn Road and adjacent to the Bridgewater Canal to the south of the site. Mature hedgerows line either side of Runcorn Road, Mill Lane and the A56 Chester Road, with the occasional gap for field access and in some locations degraded hedgerows.

Runcorn Road and Mill Lane traverse the site. Mill Lane is an access track to the existing dwellings within the site. The route of the proposed Western Link Road lies at the eastern end of the site.

A public right of way runs through the site on a north west/south east alignment. The route crosses through the centre of an agricultural field connecting Runcorn Road and Mill Lane adjacent to the existing housing at Grange Green Manor, a recently renovated barn conversion development.



## Surroundings

The site is bound by the Manchester Ship Canal to the north and the West Coast railway line to the north west. To the south east, the A56 forms the boundary, with a parcel of land to the south of the A56, immediately adjoining Walton and the Warrington settlement boundary, included. The Bridgewater Canal encloses the site at its southern boundary. At the eastern extent, the boundary follows Bellhouse Lane and Runcorn Road.

An area of industrial uses lies on the northern side of the Ship Canal, including Port Warrington and Salvay Interlox Ltd.

The site is well related to existing facilities serving the established local residential area within Walton, including primary schools, a range of shops, public transport routes, a pub and a range of recreational facilities.

The Council has confirmed in the PSLP that the site's location will ensure good access to Stockton Heath District Centre, Warrington Town Centre, the major development area at Warrington Waterfront and other major existing and proposed employment areas, including Daresbury.

Existing bus routes along the Chester Road (A56) site frontage and through the site along Runcorn Road are summarised in the table below. The existing bus routes provide a good level of service and existing bus stops are within walking distance of the dwellings proposed on the site.

Both the 62 and X30 services run to Warrington Interchange where there are connections to a range of other bus services in Warrington and the nearby Warrington Central station provides national rail services.

The size of the site is such that it can, if necessary and subject to detailed evaluation, support improved bus services, providing enhanced connectivity. It is expected the full development will support additional bus services in due course, provided commercially by bus operators and with revenues off-setting operating costs.

Service No.	Route	Frequency
62	Warrington – Stockton Heath – Sci-Tech Daresbury – Runcorn – Widnes – Halebank (via Runcorn Road)	Half hourly (Weekdays) Hourly (Weekends)
62A	Warrington – Runcorn – Widnes – Halebank (via A56)	3 – 5 services daily (Weekdays)
X30	Warrington – Daresbury – Frodsham – Chester	Hourly (Weekdays and Saturdays)

1. View from Mill Lane looking north
2. View from PRoW FP Walton 2 looking west north across the site
3. View from A56/Chester Road looking east
4. View from A56/Chester Road looking west north ▶



1



2



3



4





PRoW Penketh 26

Manchester Ship Canal

A56 / Chester Road

HIGHER WALTON

PRoW Walton 6

PRoW Walton 2  
Retained view line

Mill Lane

Runcorn Road

Walton Hall

Bellhouse Lane

PRoW Walton 4

Holly Hedge Lane

Cheshire Ring Canal Walk

Moore Lane

Chester to Manchester Railway Line  
Crewe to Warrington Railway Line

MOORE

14

WALTON

PRoW App

PRoW App

A5060

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














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# 04 Opportunities and Constraints

Opportunities and constraints relevant to the development of the site are shown on the plan opposite. They have been informed by site visits, reference to existing data such as the DEFRA Magic Mapping service and evidence base documents such as the Warrington Landscape Character Assessment 2007 and survey work instructed by the Consortium and presented in the technical appendix to this prospectus.

## Key:

 Site boundary	 Sensitive boundary
 Warrington Borough boundary	 Nationally listed buildings/structure
 Retain existing vegetation within the site where possible	 Locally listed buildings
 Existing buildings within/ bounding site	 Conservation areas
 Existing watercourses/water bodies	 Proposed Green Belt
 Extend of flood risk on site (Flood Zone 3)	<b>HSE Consultation zones:</b>
 National Trail	 Zone 1
 Public Rights of Way (PRoW)	 Zone 2
 Gas pipe	 Zone 3

# 05 The Proposals

The opportunities and constraints identified through a landscape and visual appraisal have been combined with analysis of site constraints and opportunities in relation to arboriculture, ecology, heritage, noise, transport, flood risk and utilities.

The resultant concept masterplan demonstrates the potential development opportunities of the site with a proposed allocation under Policy MD3 of the PSLP.

The SWUE would be developed as a sustainable urban extension to the main urban area of Warrington, providing around 1,800 dwellings. The urban extension would support a new community in a high quality residential setting with ease of access to Warrington's employment, recreation and cultural facilities and be supported by a new primary school, local centre and extensive areas of open space and recreation provision.

The concept masterplan has been designed to support walking and cycling for local trips and to ensure that important ecological assets within the site are preserved with opportunities to provide additional habitats and enhance biodiversity.

The urban extension will preserve, and where possible enhance the heritage assets within the site and will be designed to respect the setting of nearby heritage assets, including the Bridgewater Canal and its bridges and the Walton Village Conservation Area.



## Concept 1: Landscape buffer

Creation of landscape buffers along the northern and north western boundaries of the site. The planting of a woodland strip along these boundaries would strengthen the existing woodland and help to screen views of the industrial uses to the north of the Manchester Ship Canal. It would also help to reduce noise generated from the railway line on the western boundary.



### Concept 2: Open space and recreational network

Creation of a green infrastructure network that preserves and enhances the existing landscape features within the site and provides an attractive setting for development. A wide landscape corridor along the northern and western boundaries would create an attractive linear park, incorporating the old dismantled railway line. A central green space set around the existing water course and woodland would create a focal community space including provision for a play area.



### Concept 3: Access and circulation

Creation of a network of recreational routes throughout the site towards the National Trail, which runs alongside the Bridgewater Canal to the south of the site. These routes would offer a range of recreational loops of varying distance, linking the site to Moore, Higher Walton, Walton Hall, the existing Public Right of Way network and the Bridgewater Canal.



### Concept 4: Development parcels

The remaining parts of the site would be available for development. The development areas radiate out from Mill Lane and the central green space, fronting onto the green infrastructure network. A link road in the north east provides a vehicular connection from the A56 to the Warrington Waterfront development, whilst providing additional access to the site and Warrington Town Centre. The site provides an opportunity to develop a community hub located along the primary route, this hub could include a local centre and school.



Former Norbert Dentressangle

Solvay Intercox Ltd

MANCHESTER SHIP CANAL

A5080

A56

A56 Walton New P

WALTON

HIGHER WALTON

A56 Chester Road

Railway line

Runcorn Road

Runcorn Road

Cheshire Ring Canal Walk

Holly Hedge Lane

A56 Chester Road

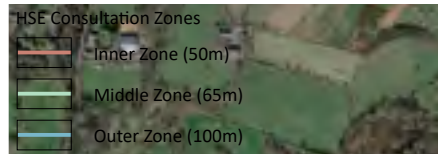
Walton Gardens

Walton Hall

**KEY:**

-  Site boundary
-  Local Authority Boundary
-  Proposed Green Belt
-  Existing vegetation
-  Proposed trees and woodland
-  Proposed development cells
-  Proposed development to be no higher than 2 storey along A56
-  Potential locations for a school (A or B)
-  Proposed play area
-  Potential location for retail / local centre
-  Proposed primary road
-  Proposed secondary / tertiary roads
-  Proposed public open space
-  Proposed allotments
-  Existing Public Right of Way
-  Proposed footpath
-  Proposed cycleway with existing residential access retained
-  Proposed route of western link road
-  Gas pipeline and easement
-  Proposed vehicular access points

NB: Masterplan subject to change following detailed survey work



- Total site area: 119.59 ha / 295.52 ac
  - Total existing properties within red line: 6.37 ha / 15.74 ac
  - Total existing roads within red line (A56/Runcorn Road): 1.80 ha / 4.45 ac
  - Total proposed spine road corridor within red line (outside development): 2.74 ha / 6.77 ac
  - Total proposed green infrastructure (all typologies): 53.16 ha / 131.36 ac
  - Total existing properties, proposed roads and green infrastructure: 64.85 ha / 160.25 ac
- The breakdown of land-use areas are:
- Land north of A56 and Runcorn Road:
- Potential school (location to be confirmed): 1.40 ha / 3.46 ac
  - Potential retail/local centre: 0.50 ha / 1.24 ac
  - Residential development: 41.14 ha / 101.82 ac / 103.59 ac
    - Residential development within Solvay Interiors Ltd middle zone: 13.50 ha / 33.27 ac / 49.84 ac
    - Residential development within Solvay Interiors Ltd outer zone: 26.64 ha / 66.30 ac / 98.75 ac
    - Residential development within middle zone: 0.86 ha / 2.13 ac / 3.13 ac
    - Residential development within outer zone: 0.86 ha / 2.13 ac / 3.13 ac
  - Total units @ 35 units per ha: 1467
- Land south of Runcorn Road:
- Residential development: 5.53 ha / 13.66 ac
  - Total units @ 35 units per ha: 194
- Land south of A56 Chester Road:
- Residential development: 6.17 ha / 15.25 ac
  - Residential development: 6.17 ha / 15.25 ac
    - Residential development within outer zone: 1.95 ha / 4.82 ac (up to 68 units @ 35/ha)
  - Total units @ 35 units per ha: 217
- Total units across whole site @ 35 units per ha: 1851**

# 06 Suitable & Achievable

The Council has demonstrated that there are ‘exceptional circumstances’ to warrant the review of the Green Belt boundaries in the Borough. There are insufficient sites available within the existing urban area to meet the full housing needs of the borough, and neighbouring authorities are unable to accommodate some of Warrington’s identified housing needs.

The Council recognises that the urban extension is of a sufficient scale to provide a range of services to support a new residential community in this part of Warrington, including a local centre, primary school, health facility and a network of open spaces. Its location will also ensure good access to Stockton Heath District Centre, Warrington Town Centre, the major development at Warrington Waterfront and other major existing and proposed employment areas, including Daresbury. The ability of the SWUE to make such a significant and sustainable contribution towards meeting Warrington’s development needs provides the exceptional circumstances required to justify the removal of the site from the Green Belt.

A significant amount of technical assessment work has been undertaken on behalf of the SWUE Consortium to demonstrate that the SWUE site is suitable and achievable.

This technical work supplements the evidence base work undertaken by the Council and is submitted as a technical appendix to this Development Prospectus.

The following suite of investigations have been undertaken to inform this assessment:

- Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal (Randall Thorp)
- Ecological Appraisal (TEP)
- Noise Screening Assessment (Miller Goodall)
- Flood Risk Assessment & Drainage Appraisal (SGI)
- Arboricultural Walkover Survey and Desktop Assessment (TEP)
- Heritage Appraisal (Turley Heritage)
- Transport Appraisal (iTransport)
- Health & Safety (SGI)

The key findings of the technical work undertaken on behalf of the SWUE Consortium are summarised in the following table, and has influenced the concept masterplan presented in this Development Prospectus.



## Environment

### Landscape, Townscape & Visual Sensitivity

A Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal has been undertaken by Randall Thorp. The report considers the existing character and visibility of the site, reviews the landscape, adjacent townscape and visual baseline in order to provide evidence to support the allocation of the site and inform the concept masterplan for residential development.

The appraisal demonstrates the site's ability to accommodate development in principle without undue impacts on the surrounding landscape, and concludes that there is no reason why a well-designed development that preserves the existing landscape features such as watercourse and trees within a green infrastructure network and responds sensitively to the setting of the Walton Village Conservation Area and heritage assets, would have any significant effects on the landscape and townscape character of the surroundings.

With appropriate good design and well thought out landscape mitigation measures, development within the site has the potential to avoid significant effects on the visual amenity of the surrounding receptors.

There are no landscape, townscape or visual sensitivities which would prevent the SWUE site being developed as a sustainable urban extension for around 1,800 dwellings and associated infrastructure.

### Ecology

A Preliminary Ecological Appraisal of the site has been undertaken by TEP, informed by the results of a desktop assessment and site surveys.

The appraisal concludes that the provision of large areas of open greenspace in the northern part of the SWUE site will be of benefit. New crossings through existing hedgerows, treelines and across watercourses will be designed so as to impose minimal impacts on protected species and habitats. Any losses will be mitigated within the open greenspace to be provided within the site.

Further detailed surveys will be required at planning application stage, including in relation to bats, amphibians, otter and water voles, badgers and nesting birds. A Reasonable Avoidance Method Statement (RAMS) for brown hare, hedgehog and potentially common toad will be provided to detail how harm to these species will be avoided during construction works. Management plans to prevent the spread of invasive species (Himalayan balsam, Japanese knotweed, Japanese rose and rhododendron) during development can be secured via condition at planning application stage.

The appraisal presents a number of measures which could be included to ensure that there is a measurable gain in biodiversity on the site. Such measures could potentially include the installation of bird and bat boxes around the site, the provision of areas of wildflower / grassland planting as part of the landscaping proposals, the inclusion of berry-bearing and nectar rich species of ornamental / landscape planting to provide a foraging resource for a range of wildlife species, including invertebrates, birds and bats.

The appraisal concludes that there are no overriding ecological constraints which preclude sustainable development of the site.

### Noise

Miller Goodall has undertaken a desktop noise screening assessment, a preliminary walkover survey and preliminary noise measurements to review potential issues and solutions associated with noise at the SWUE site.

The assessment concludes that noise would not be a barrier to residential development on the site. Whilst the assessment identifies some areas of the site where noise will need to be considered at the detailed design stage (e.g. adjacent to existing roads and the railway line and industrial and commercial operations around the periphery of the site), a suitable and commensurate level of protection against noise can be provided following a detailed noise assessment(s). Such mitigation could include the orientation of plots within the layout, enhanced glazing / alternative ventilation to affected properties and / or acoustic barriers.

There will be no significant impacts for noise as a result of the development and, with good acoustic design, the impacts can be minimised.

## Environment

### Flood Risk and Drainage

A Flood Risk & Drainage Appraisal has been undertaken by Shepherd Gilmour Infrastructure (SGI) to provide an in-depth assessment of the potential flood risk on-site and identify an initial foul and surface water drainage strategy for the SWUE, which has informed the concept masterplan for the site.

The majority of the SWUE site is located within Flood Zone 1 (low probability of flooding), with some small areas close to the unnamed watercourse which crosses the site indicated as Flood Zones 2 and 3 (medium and high probability). Where possible, built development will be located within Flood Zone 1.

SGI has presented an indicative site-wide drainage strategy which demonstrates one option for how the site could be drained; there are likely to be a number of suitable drainage strategy options available.

The indicative drainage strategy presented by SGI indicates that the proposed development will prioritise infiltration as a means to dispose of surface water runoff. If ground conditions prohibit infiltration, plots / parcels will be allowed to discharge clean / untreated runoff into the main network(s) in the highway. The main surface water infrastructure will discharge clean / treated runoff into the Manchester Ship Canal or onsite watercourse at an approved greenfield runoff rate. Discharge locations and attenuation structure(s) can be approved at detailed design stage. The proposed foul flows from the development will discharge to existing United Utilities combined water sewer(s) via the main foul water infrastructure within the highway. Connection point(s) to the combined water sewer are to be agreed with United Utilities at detailed design stage.

### Arboriculture

A preliminary arboricultural survey and desktop assessment of the SWUE site has been undertaken by TEP, to identify potential constraints and opportunities for future development and report on the preliminary assessment effects of the concept masterplan for the site.

Trees cover a relatively small proportion of the total site area and are predominantly concentrated towards the western half of the site. The majority are located along watercourses, on field boundaries and within hedgerows parallel to public highways.

In terms of quality and particularly habitat and amenity benefits, the tree population is good but could be improved. The extant population provides good screening and contributes to visual amenity and the creation of a rural aesthetic. However, canopy cover is relatively low and connectivity would benefit from reinforcement in some areas.

Existing tree cover on the site is relatively limited and mostly confined to a few key areas following water courses, the canals and railway, and public highways. Due to these areas being less suitable for development due to proximity to sensitive receptors or sources of noise, the concept masterplan generally respects existing tree cover. It is therefore likely that residential development in broad accordance with the concept masterplan could be delivered without necessitating significant tree removal.

Given the landscaping and green infrastructure shown on the concept masterplan, it is also likely that development of the site would result in an increase in tree canopy cover. This point is reinforced by the relatively low extant tree cover within agricultural fields.

A detailed tree survey undertaken according to BS5837:2012 will be undertaken to inform the detailed design stage.

## Environment

### Heritage

A Heritage Appraisal has been undertaken and identifies heritage assets with potential to be affected by the development of the SWUE site and identifies whether there are heritage constraints to development and how these constraints could be resolved or mitigated.

The appraisal recommends a number of measures which will help to reduce the impact of the development on the significance (by way of setting) of the identified heritage assets. These measures have been incorporated into the concept masterplan that has been prepared by Randall Thorp. The Heritage Appraisal concludes that, if these measures are implemented, the development of the SWUE will sustain the significance of the following designated heritage assets, in accordance with NPPF Paragraphs 192 and 193:

- Aqueduct carrying the Bridgewater Canal over Chester Road (old line)(grade II listed)
- Thomasons Bridge over Bridgewater Canal (grade II listed)
- Acton Grange Bridge (Over Bridgewater Canal) (grade II listed)
- Walnut Tree Farmhouse (grade II listed)
- Walton Hall Lodge (now Lodge to Crematorium) (grade II listed)
- Gates, gatepiers and screens at Walton Hall Lodge (now Lodge to Crematorium) (grade II listed), and
- Walton Village Conservation Area (grade II listed).

The requirement of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act can be satisfied in determining future planning applications, subject to a considered design approach.

The development of the SWUE site will result in the partial loss of the rural setting of the following locally listed buildings (non-designated heritage assets):

- 2 Cockfight Cottages
- 4 Cockfight Cottages
- Porch House Farm
- Canal Farmhouse
- Grange Green Manor
- Grange Mill House
- The Vicarage
- School converted to Home
- Underbridge Cottages
- Stoneoaks Cottage, and
- 99 Chester Road.

In accordance with NPPF Paragraph 197, in weighing future applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

## Infrastructure

### Highways

iTransport has prepared a transport appraisal which considers the transport and highways related aspects of the development proposals at SWUE.

The appraisal demonstrates that the proposed development will support and promote sustainable development and sustainable travel patterns with residents able to meet day-to-day needs locally. As such, it is a suitable location for development.

Access to the site is proposed off Chester Road and Runcorn Road and feasibility level designs of the principal accesses have been produced and the capacity of these considered. The access arrangements will operate satisfactorily. Access to the site is deliverable and achievable.

The proposed Western Link will provide significant additional capacity in the central Warrington Road network and will assist in facilitating the full SWUE development proposals.

Traffic assessments of a first phase of development, delivered in advance of the Western Link, demonstrate that the generated traffic flows will form only a small proportion of existing traffic flows, well within daily variations in traffic, and will not result in severe traffic impacts.

The residual cumulative traffic impacts of development on the site will not be severe and therefore, in accordance with the NPPF, development should not be prevented on transport grounds.

### Health & Safety

Solvay Interox Ltd and the Former Norbert Dentressangle site are located to the north of the Manchester Ship Canal. Both facilities are identified by the Health & Safety Executive (HSE) as an upper tier COMAH (Control of Major Accident Hazards Regulations 2006) site. The Inner, Middle and Outer HSE Consultation Zones extend into the SWUE site.

The concept masterplan has been prepared to accord with the HSE safety zoning. Consequently, the proposed housing will be located in the middle and outer consultation zones, which will comply with the HSE guidelines.

Discussions with the HSE to agree this position are ongoing.

There is no health and safety reason to prevent the site being allocated for residential development.

**The technical assessments demonstrate that the site is not affected by any insurmountable constraints. The concept masterplan as presented is, therefore, fully deliverable.**



# 07 Deliverable

The SWUE Consortium members each have land interests within the South West Urban Extension. All three members have significant experience of promoting and delivering residential development across the North West of England.

The Consortium fully supports the allocation of the SWUE in the PSLP. The SWUE presents an opportunity to deliver a significant scale of new housing and associated infrastructure which will benefit both existing and new residents.

The development of the SWUE aligns with the overarching vision, objectives and spatial strategy of the PSLP. It also aligns with national policy which recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, including significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

The SWUE Consortium are committed to continuing to work together, and with the Council, to ensure that the SWUE is developed in a comprehensive and coordinated manner at the earliest opportunity. A Memorandum of Understanding has been prepared and confirms the Consortium members' commitment to joint working.

As demonstrated in the preceding section of this Development Prospectus, a significant amount of technical assessment work has been undertaken on behalf of the SWUE Consortium members, both collectively and individually. This technical assessment work demonstrates that, subject to obtaining planning permission, there are no insurmountable obstacles to immediate development on the SWUE site.





# 08 Benefits

## Community Benefits



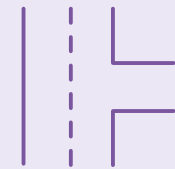
### New local centre

including retail and health facilities



### 53 hectares

of green infrastructure, including formal play space, recreation areas and allotments



Land and contributions to a new

### Western Link Road



### 30%

affordable housing



Land and contributions to a new

### Primary School



Financial contributions towards additional

### Secondary School Places

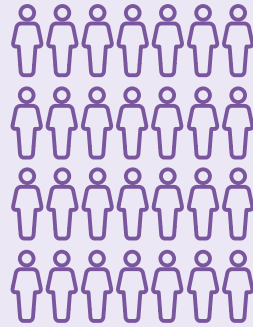


## Construction Phase



**£222 million**

Investment<sup>1</sup> in the developments' construction



**135 net additional jobs**

Full-time equivalent (FTE) jobs supported on average during the construction period (circa 17 years)

**Including 90 direct jobs**

Supported in the North West (FTE), including 40 in Warrington

**Plus 45 indirect/induced jobs**

Supported in the North West (FTE), including 10 in Warrington



**£148 million**

GVA<sup>2</sup> economic output during construction, including £54 million in Warrington

## Operational Phase



**4,200**

New residents, of whom 2,035 are likely to be in employment



**£3.1 million**

Annual uplift in Council Tax collected by Warrington Borough Council



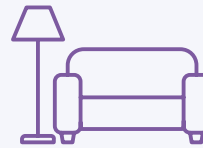
**£10.6 million**

New Homes Bonus payments to Warrington Borough Council



**£55.5 million**

Gross annual resident income



**£9.8 million**

Resident expenditure upon first occupation to 'make a house' feel like a home'



**£23.7 million**

Annual retail expenditure by residents



**£13.2 million**

Annual leisure expenditure by residents



**290 jobs**

In retail and leisure industries supported resident expenditure

<sup>1</sup> The total construction investment includes infrastructure costs and professional fees

<sup>2</sup> GVA (Gross Value Added) measure the value of output created (i.e. turnover) net of inputs used to produce a good or service (i.e. production of outputs). It provides a key measure of economic productivity. Put simply the GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes.



# 09 Summary & Conclusions

This Development Prospectus sets out a vision and concept masterplan for the sustainable development of the Warrington South West Urban Extension (SWUE), which is identified as a housing allocation in the Proposed Submission Version of the Warrington Local Plan.

The concept masterplan presented within this document provides a framework which responds to its context. It demonstrates that the site is capable of accommodating around 1,800 new homes (including affordable housing) alongside supporting infrastructure including a potential primary school and local centre, strategic green infrastructure, local open space and drainage and highways infrastructure.

This document has been prepared on behalf of the South West Urban Extension (SWUE) Consortium, which comprises Peel Holdings (Management) Ltd, Story Homes and Ashall Property. The Consortium are committed to continuing to work together, and with Warrington Borough Council, to secure the delivery of much-needed housing and associated infrastructure on the site at the earliest opportunity.



**Turley**



# RUNCORN ROAD, HIGHER WALTON

VISION DOCUMENT, SEPTEMBER 2017







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# 01 INTRODUCTION



Site Boundary

This Vision Document has been prepared on behalf of Story Homes North West and Brian Priestner to set out how the land at Runcorn Road, Higher Walton ('the Site') can contribute to the proposed Warrington South West Sustainable Urban Extension. It supports the case for releasing this site from the Green Belt and allocating it for housing, as part of the Council's Local Plan Review. It demonstrates that it will provide a sustainable solution to help Warrington Borough Council meet its future housing growth requirements.

To ensure the appropriate development of the Site, Story Homes has instructed a professional development team with a proven track record in delivering successful schemes. This document assesses the sustainability and suitability of the Site and builds upon work already undertaken by Warrington Borough Council (WBC) on the Warrington South-West Sustainable Urban Extension.

At the outset, it is highlighted that the Site:

- Is in a highly sustainable location in close proximity to the existing services and facilities within the village centre of Moore;
- Will result in a relatively minimal harm to the key purposes of the Green Belt; and
- Provides an opportunity to create a high quality development which will maintain the positive character of the Higher Walton conservation area through good design and high quality landscape proposals.

This document is submitted to the Council alongside the representations to the Warrington Local Plan Preferred Option consultation (September 2017) produced by WYG. The representation should be read in conjunction with this Vision Document.





# INTRODUCTION TO STORY HOMES



Story Homes is a privately owned housebuilder, founded by Fred Story in 1987. It has a long and successful reputation of building quality and high specification homes across the North of England and South of Scotland. The family owned business has grown in size and status over the years but remains grounded, built on its original ethos of 'doing the right thing' and creating a brand synonymous with quality.

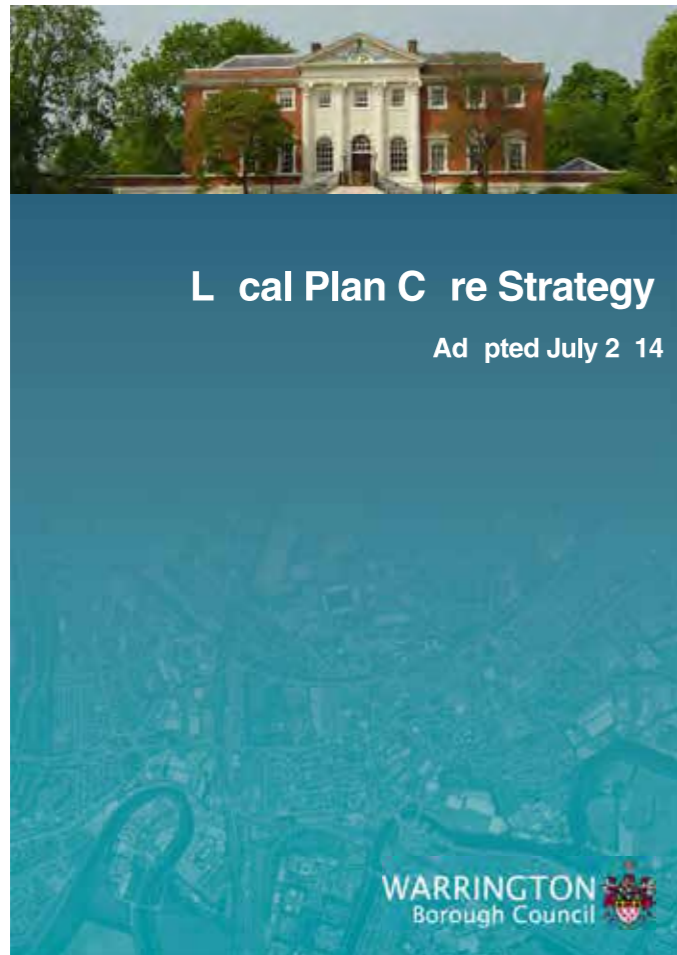
For nearly 30 years Story Homes has been the name most often associated with aspirational homes for sale throughout Cumbria, the North East and Lancashire. A passion for quality and excellence has seen Story Homes become a multi-award winning UK property developer, with modern and attractive homes instantly inspiring buyers. Story Homes have been awarded the top '5 star' rating in the house building industry's annual customer satisfaction survey for the 4th year running since becoming eligible for 4 years ago.

Story Homes' success is underpinned by a determination to understand the needs of communities where we build and a goal to deliver design quality and high quality building specifications that enhance locations. Story Homes' presence in the North West is growing significantly and has recently been awarded 3 UK Property awards for Brookwood Park in Kirkham, The Woodlands in Shotley Bridge and Pentland Reach in Biggar.

The Story Difference, comprising a commitment to design quality, place-making and customer experience, will be instrumental in delivering an exemplary new development which Higher Walton can be proud of.

# 02 THE PLANNING CONTEXT

## THE EMERGING WARRINGTON LOCAL PLAN REVIEW



Warrington Borough Council adopted its Local Plan Core Strategy in July 2014. This set out a need to build 500 new homes every year up to 2027. This requirement is now out of date.

Following the adoption of the Core Strategy, a High Court Challenge subsequently quashed the specific parts of the Plan relating to:

- The housing target of 10,500 new homes (equating to 500 per year) between 2006 and 2027 and;
- References to 1,100 new homes at the Omega Strategic Proposal

Given the results of the High Court challenge and the emerging evidence underpinning the Borough's growth needs and economic development ambitions, the Council recognised the need to undertake a review of the Local Plan.

A Local Plan Scoping Stage consultation was undertaken in November 2016. The Council then published their Preferred Development Option for consultation in July 2017. This sets out the current housing and employment land requirement for the Borough and the preferred option strategy for meeting these needs.

To underpin the Local Plan review, the Council commenced the preparation of the Borough's housing and economic needs to the year 2037. The most up to date study assessing the housing objectively assessed need (OAN) for the Borough identified a need of 955 new homes per year to 2037.

The Council has also assessed the number of additional jobs that will be created through the Council's growth aspirations set out in the 'Warrington Means Business' economic development programme as well as the Local Enterprise Partnership's (LEP) Strategic Economic Plan and future growth ambitions. These growth aspirations will deliver 31,000 new jobs in Warrington up to 2040 which is approximately 30% above the baseline forecasts and there is a need to ensure a balance between the number of homes and jobs.

There is also a need to provide an additional 5% buffer to allow for flexibility (as directed by the National Planning Policy Framework) and to make up for an existing backlog of 847 homes. All of this means that it will now be necessary to increase the minimum supply of homes to around **1,200 per annum**. The Council are also seeking to identify 'safeguarded land' to meet further needs in the ten years beyond the Plan period.

The most recent Strategic Housing Land Availability Assessment (SHLAA), published in January 2016 has identified that Warrington's housing needs cannot be met on brownfield land, existing commitments and on greenfield sites outside of the Green Belt.

If Warrington is to meet its development needs, then based on the Preferred Development Option, sufficient Green Belt land will need to be released to deliver approximately 9,000 new homes and 213 hectares of employment land over the next 20 years [from Preferred Development Option, WBC, July 2017].

The Council have sought to deliver as much housing as possible within the urban area. They commissioned an Urban Capacity Study which estimated that 15,429 homes could be delivered on existing urban sites, a figure which we feel is unrealistically high and is open to challenge. However, the Council nevertheless maintain that they will need to release sufficient Green Belt land to deliver 8,791 homes (see Table 1).

The Preferred Development Option is Option 2. This is for the majority of Green Belt release to be adjacent to the main urban area in Warrington, with incremental growth in the outlying settlements. This includes a Garden City Suburb of approximately 6,000 new homes to the south-east of Warrington and an urban extension in South-West Warrington of around 2,000 homes.

#### Warrington South West Urban Extension Framework Plan

The Council have commissioned a Framework for the proposed South West Urban Extension. The Framework Plan includes two options: Option 1 includes a new strategic link road (the 'Western Link') and Option 2 does not include this link road. The Council's evidence base documents establish that the Western Link is not required in order to deliver the South-West extension (see WBC's Area Profiles document). The Site is also not dependent on the Western Link for implementation. The Western Link has the potential to deliver much wider economic benefits to the Borough and the wider region. However, it is considered that economic success can only meet its true potential when supported by a strategic and suitably flexible policy agenda. The delivery of Green Belt sites in the first five years of the Plan period will be critical in establishing the economic growth locally in South-West Warrington and across the Borough and therefore this is likely to be delivered ahead of the link road. The Option 1 and 2 Framework Plans are provided on the following pages.

The Site forms part of the area identified for the Warrington South West Urban Extension (it actually represents around 25% of this proposed allocation), which is key to the delivery of WBC's new Local Plan. It has a total area of around 21.3 hectares and could deliver around 450-500 units, therefore representing a major contribution to this extension and to the delivery of new homes to meet identified future needs. It is identified for development within WBC's Warrington South West Urban Extension Framework Plan Document.

This represents very clear "exceptional circumstances" to justify the release of land from the Green Belt. The Site at Runcorn Road in Higher Walton has the potential to make a substantial contribution to the social and economic success of the Borough.

	955 p.a.	1,113 p.a.	1,332 p.a.
Housing Target 2017 to 2037	19,100	22,260	26,640
Flexibility at 5%	955	1,113	1,332
Backlog (from 2015 against OAN)	847	847	847
Total Requirement	20,902	24,220	28,819
Total Capacity within urban area	15,429	15,429	15,429
Green Belt requirement	5,473	8,791	13,390

Table 1: Housing Land Requirements

Table extracted from Preferred Development Option, WBC, July 2017



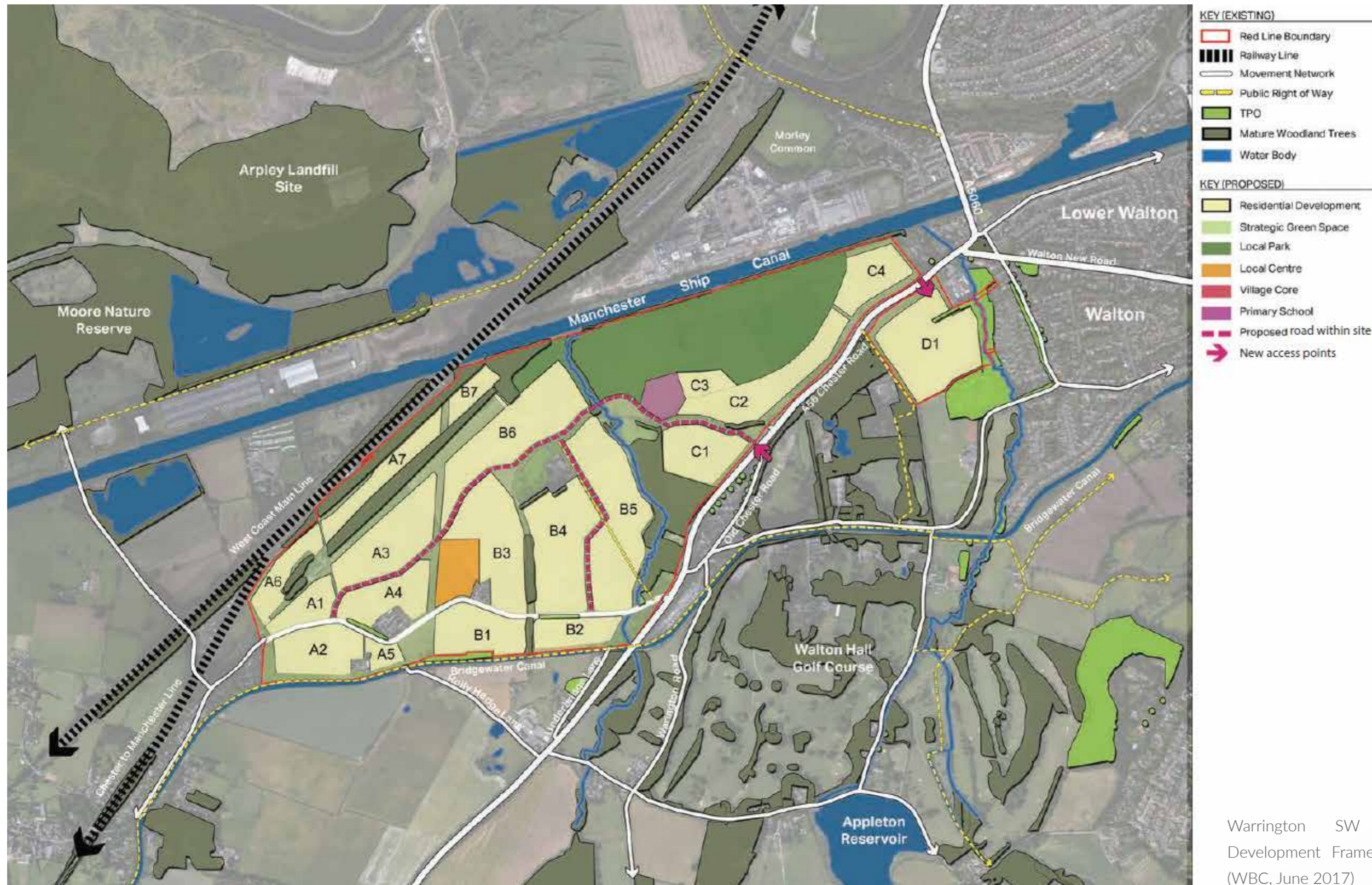
Location of the proposed South-West Urban Extension (from Preferred Development Option WBC July 2017)

# FRAMEWORK PLAN - OPTION 1



Warrington SW Urban Extension Development Framework Plan Option 1 (WBC, June 2017)

# FRAMEWORK PLAN - OPTION 2



Warrington SW Urban Extension  
 Development Framework Plan Option 2  
 (WBC, June 2017)

# 03 THE SITE

## LOCATION AND OWNERSHIP



Story Homes' land at Higher Walton comprises a series of separate land parcels that forms a significant combined area of around 21 hectares, representing a major part of the Warrington South West Urban Extension. The Site is well located, being close to the strategic motorway with good access to both the M6 and M56, and lying only around 3.5 km from the Warrington town centre (to the north-east). The site lies in an area of land between the A56 (to the south-east) and Manchester Ship Canal (to the north). The Bridgewater Canal passes through this area, to the north of the Site. The village of Moore lies to the west of the site, and Higher Walton to the east.

These parcels are:

- Land south of Runcorn Road (east) – parcels B1 and B2 within the SW Urban Extension
- Land south of Runcorn Road (west) – part of parcel A2
- Land east of Bellhouse Lane – parts of parcels A3 and A4
- Land north of former railway line – part of parcel A7

Collectively these parcels are referred to as 'the Site.'

The Site is currently owned by one landowner under one single title whom Story Homes have an agreement with. The site is therefore under the control of a single housebuilder. There are no ownership or legal constraints to its delivery for housing.

Story Homes are committed to bringing the site forward for housing and will progress a scheme as soon as the site is allocated. This will involve pre-application discussions with Warrington Council and public engagement.

# 04 GREEN BELT ASSESSMENT

The land lies between the villages of Moore (to the west) and Higher Walton (to the east). It lies in a wedge of land between the railway line and Manchester Ship Canal to the north and the A56 (Chester Road) and canal to the south-east. Both of these linear features serve to protect the surrounding countryside from the impact of development here. This area, which includes all of the above land parcels, has been identified by WBC as the site of the Warrington South West Urban Extension. The Green Belt Assessment (Arup, 2016) places the subject land at Higher Walton within general area division parcel 14. This is assessed as making a 'moderate' contribution to the Green Belt overall.

At the next level of analysis, the Green Belt Assessment places most of the land in parcel WR65, which covers a much larger area including land to the west. The only part of the Site not included in WR65 is the smaller site to the south of Runcorn Road, which has not been covered in the Green Belt Assessment.

W65 has also been assessed as making a 'moderate' contribution overall to the Green Belt. The contribution in regard to safeguarding the countryside from encroachment is rated as 'strong', however this is largely due to the parcel's eastern boundary which is located away from the Site; with regard to the Site, we believe that this land does not make a strong Green Belt contribution.

The Green Belt assessment is partly based on the contribution that the parcel makes to Walton Village Conservation Area. However, the Site is not located adjacent to Walton Village and is separated from it by the A56. Development of this land will not therefore have a direct impact on the setting of the Conservation Area.

The Site is within a reasonably well-enclosed area meaning that the surrounding Green Belt, and landscape character, will not be harmed by its development.

Overall, therefore, the Site can be released without detriment to the wider Green Belt. This means that this is a positive context for development in comparison to other sites.



# 05 SUSTAINABILITY

WBC's Area Profiles document has considered service provision for the Warrington South West Sustainable Urban Extension Area within the context of Warrington and has concluded that development of the scale envisaged can be supported by existing and enhanced infrastructure.

It is also useful to consider more local services, as the Site's land is accessible to services in local villages that have not been included within WBC's Settlement Profiles for the outlying settlements.

We have undertaken analysis of the location of key community facilities in the vicinity and their accessibility from the Site (see the Facilities Plan).

New housing on the Site will be served by existing local facilities at Higher Walton and Moore, in addition to services within Warrington. Moore (to the west) is within 10 minutes' walk of the site and Higher Walton (to the east) is within a 5 minute walk. Additionally, facilities are also available in Daresbury to the south, including a significant number of jobs, and in Stockton Heath. All of this is without considering the new local centre that is proposed to be constructed adjacent to the subject land as part of the SW Warrington Sustainable Urban Extension.

Moore has several local facilities:

- Moore County Primary School
- Moore Village Pre-School
- Red Lion Inn PH
- Moore Village Store and Post Office

To the east, Higher Walton has the following services:

- St John the Evangelist's Church
- Walton Lea Crematorium
- The Walton Arms PH

The area is also well served by bus services with the 43A, 62, 62B, 66 and 70 routes all stopping on Runcorn Road. These services offer a bus every 15 minutes to both Warrington and Runcorn town centres.

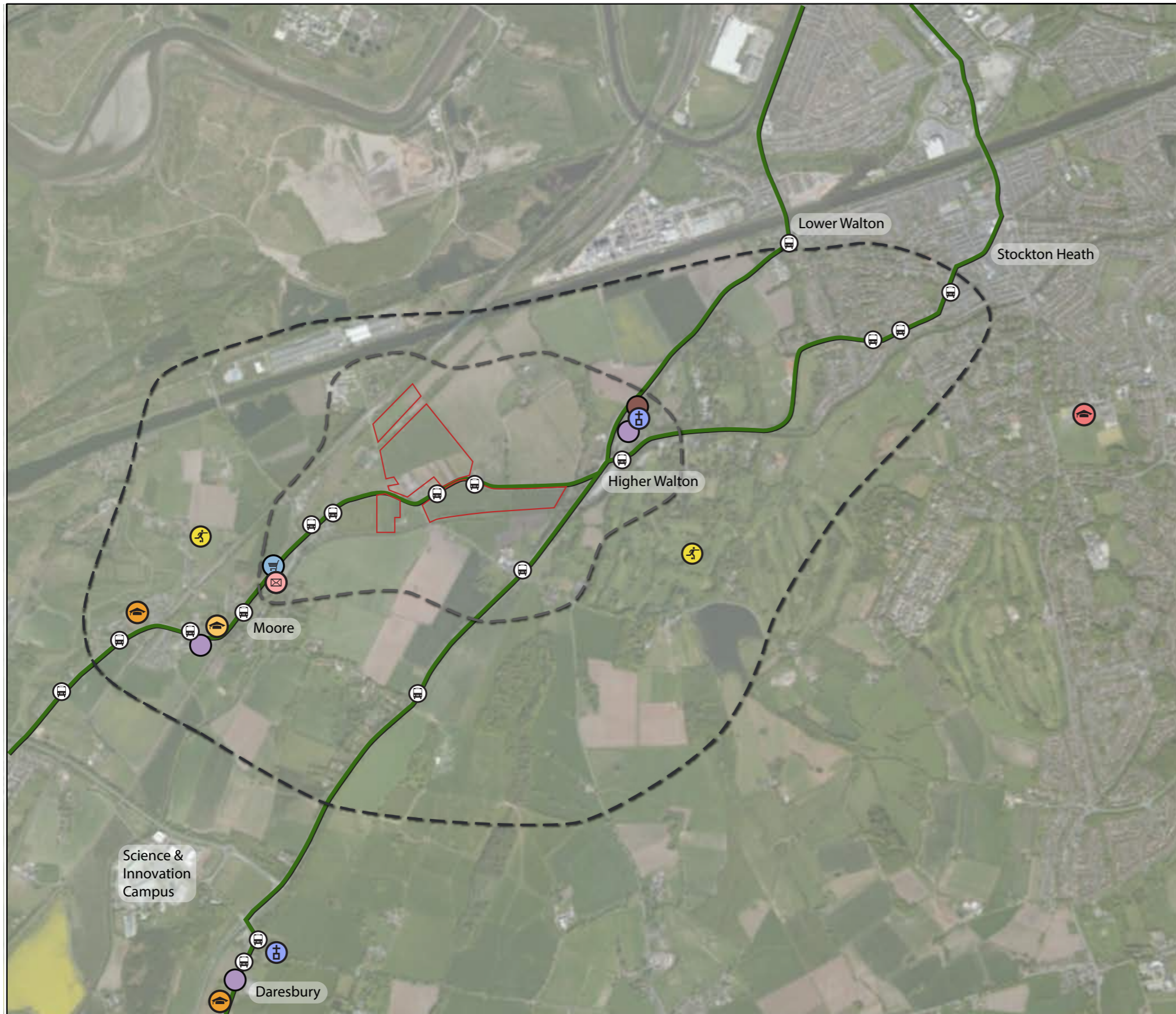
A little further to the south lies Daresbury village, which also has:

- Daresbury Primary School
- All Saints Church
- Ring O'Bells PH
- A large amount of jobs at Daresbury Park





# FACILITIES PLAN



- Site boundary
- Bus stop
- Bus route
- Convenience store
- High school
- Primary school
- Pre-school
- Post office
- Sports facilities
- Public house
- Crematorium
- Church
- 1km isochrone
- 2km isochrone

# 06 BENEFITS AND INFRASTRUCTURE



In order to justify the release of this Site from the Green Belt the Council must in their plan making demonstrate exceptional circumstances but also ensure that this would constitute sustainable development. The NPPF states that “sustainable development is about positive growth – making economic, environmental and social progress for this and future generations: “At the heart of the National Planning Policy Framework is a presumption in favour of sustainable developments, which should be seen as a golden thread running through both plan-making and decision-taking.”

The development of this Site in Higher Walton will deliver significant and lasting economic, social and environment benefits to the local community.

## Social Benefits

- Family homes – the Site can address the growing need for new high quality and modern family homes in Higher Walton. It will deliver a wide range of new homes in terms of type and size, to meet the needs of different families in the community.

- Affordable homes – the new community will include a substantial number of new affordable homes, such as starter homes and affordable rented houses. This will significantly enhance opportunities for home ownership, helping less affluent families and young first time buyers to get onto the housing ladder.
- Open Space – the development will provide a significant amount of public open space for new and existing residents to enjoy. There will be enhanced connectivity to recreation facilities beyond the Site for the existing housing development to the west, south and east.

## Environmental Benefits

- Environmental improvements – the new high quality landscape proposed can provide new and enhanced habitats to increase the biodiversity value of the Site, whilst providing new landscape features and greenspaces for the community to enjoy.
- New drainage infrastructure – the landscape strategy for the Site includes a Sustainable Urban Drainage Scheme (SuDS).
- Recreational resources – the Site will provide new open space and green infrastructure for the local community to enjoy and spend time in.
- Access – as the Site is within a 5 minute walk of Moore and Higher Walton village centres, this will encourage new residents to use pedestrian and cycle routes into the village rather than the private car.
- Improvement of existing areas of poor landscape value, such as land around the disused railways.

## Economic benefits

- Economic growth – the Site will bring new working age families in Higher Walton. This will be crucial to ensure that there is a resident labour force in the area, which can underpin sustainable economic growth without resulting in large increases in in-commuting from elsewhere in the region.
- New jobs – building new homes creates significant numbers of new jobs in construction, in the supply chain and in related services such as shops and leisure centres.
- Increased spending power – new homes will bring new economically active families into Higher Walton, who will spend their disposable income in local shops and services. This will boost businesses and increase local vitality and the viability of local services and facilities.
- Increased revenue – the new homes will substantially increase Warrington Borough Council’s revenue base as a result of significant increases in Council Tax income.

## Site Related Infrastructure

- Catchment population to help support new local centre.
- New areas of public open space.

# BENEFITS AND INFRASTRUCTURE



The Site will provide a range of new and expanded infrastructure to ensure that the new development is sustainable and self-sufficient, has access to day-to-day services and facilities, and is capable of integrating successfully with the existing local community.



## Community Benefits

This could include investment in:

- New recreational open spaces and play areas for children
- New school places and improved facilities for primary and secondary children
- Expanded health services, including more places in GP surgeries and dental practices
- New landscaping, including tree planting and wetland areas
- New and improved bus services and cycle lanes

Story Homes can confirm that the Site is:

- Available for development. Story Homes has an agreement with all of the landowners with an interest in the Site, to bring it forward for residential development (subject to its release from the Green Belt). There are no legal or ownership constraints to its delivery;
- Achievable and viable for residential development. It is located in a strong market area which experiences high demand for new homes and there are no overriding constraints which present an obstacle to delivery.

# 07 CONCLUSION



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The emerging Local Plan recognises that Warrington must provide new homes both to meet the needs of its population and to underpin economic growth. Warrington Borough Council acknowledges that this cannot be achieved on brownfield land alone. Green Belt releases are essential.

This Vision Document sets out how the land at Runcorn Road, Higher Walton can provide a new, high quality residential development. It will provide attractive and well-built family homes as part of a sustainable natural and tranquil environment, integrated with new green and blue infrastructure. It will help Warrington to meet its growing and urgent housing needs.

The Site can be brought forward using a comprehensive masterplanning process, with significant involvement from both Warrington Borough Council and the existing local community.

This Vision Document provides the evidence to demonstrate that this Site in Higher Walton represents a logical and sustainable development opportunity where the exceptional circumstances to support its release from the Green Belt are clear. A number of technical assessments have confirmed that there are no physical constraints or other potential impacts or environmental conditions which could preclude the development of the Site for housing. The proposed development clearly accords with the three dimensions of sustainable development as set out in the NPPF.

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# NEXT STEPS

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The Site is in the control of a well-known high quality housebuilder (Story Homes), and is considered suitable and deliverable within the first 5 years of the emerging Local Plan period.

Story Homes are committed to progressing the emerging Concept Masterplan towards a high quality residential development that responds to the local housing need, whilst taking into account and reflecting the character of the surrounding area, and ensuring the development of the Site would form a new defensible Green Belt boundary to the south west of Warrington.

Story Homes looks forward to working with Warrington Borough Council to progress the proposals for the Site.

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